TSD File Inventory Index

Date: July 2, 2008

Initial: CMHoward

Facility Name: Commonwealth Edison Company (Quad Cities Nuclear Power Station)

Facility Identification Number: ILD 060 862 810 (One Feature / Site)

A.1 General Correspondence		**B.2 Permit Docket (B.1.2)**	X
A.2 Part A / Interim Status	X	.1 Correspondence	X
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Tab - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		**D.5 Corrective Action/Enforcement**	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		**D.6 Environmental Indicator Determinations**	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		**E. Boilers and Industrial Furnaces (BIF)**	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		**F Imagery/Special Studies** (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		**G.1 Risk Assessment**	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.
Comments: [illegible]

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 28 1982

FILE COPY

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

HEMMINGER THOS DIR WATER QUAL
COMMONWEALTH EDISON CO GC GEN STA
PO BOX 767 ROOM 1700E
CHICAGO IL 60690
FACILITY: NORTH ON RTE 84
LOCATION: CORDOVA IL 61242
ID NO.: ILD006062810

RE: TSD Notification without Part A Application

Dear Notifier:

The United States Environmental Protection Agency (U.S. EPA) has received your notification of hazardous waste activity. On that form, by checking the "treat/store/dispose" (TSD) box, you indicated that you are a hazardous waste management facility (HWMF). To date, however, we have no record of having received Part A application for a hazardous waste permit which is required for all HWMFs.

Federal regulations require owners and operators of existing HWMFs (installations which treat, store, or dispose of hazardous waste) to have submitted a Part A permit application to the Regional Administrator by November 19, 1980, in accordance with 40 CFR 122.22. This requirement applied to HWMFs which were in existence on or before November 19, 1980. New facilities (those established after November 19, 1980) are required to submit Part A and Part B of their permit application, and receive a Resource Conservation and Recovery Act (RCRA) permit before beginning physical construction.

If your facility treats, stores, or disposes of hazardous waste, then your facility is operating without a hazardous waste permit, in violation of Section 3005 of RCRA, as amended. This violation is considered serious by the U.S. EPA, and may subject you to Federal enforcement under Section 3008 of RCRA for past and continued non-compliance.

Please submit your completed Part A application to the address below within fifteen days of receipt of this letter:

RCRA ACTIVITIES
P. O. Box A3587
Chicago, Illinois 60690-3587

We are aware that some hazardous waste handlers may have marked the TSD box on the notification form as a precaution or as a result of misunderstanding the May 19, 1980, hazardous waste regulations. If you notified us as a TSD in error, or if your status as a treatment, storage, or disposal facility has changed, please advise us in writing immediately.

Please contact Arthur Kawatachi of my staff at (312) 353-2197, if you have any questions regarding this letter.

Sincerely yours,

William H Miner for

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

Please refer to Section V. Line-by-Line Instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

Notification of Regulated Waste Activity

EPA United States Environmental Protection Agency

Date Received (For Official Use Only)

C
Exelon
Gen. Co.

1610155002

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. Initial Notification [X] B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: ILD060862810

II. Name of Installation *(Include company and specific site name)*

QUAD CITIES STATION

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: Address update

22710 206TH AVENUE NORTH

Street *(Continued)*:

City or Town: CORDOVA | State: IL | Zip Code: 61242-9740

County Code: 161 | County Name: ROCK ISLAND

IV. Installation Mailing Address *(See instructions)*

Street or P.O. Box: PO BOX 216

C

City or Town: CORDOVA | State: IL | Zip Code: 61242-0216

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: BEHRENS | *(First)*: PAUL

C

Job Title: CHEMISTRY MGR. | Phone Number *(Area Code and Number)*: 309-654-2241

VI. Installation Contact Address *(See instructions)*

A. Contact Address: Location [ ] Mailing [X]

B. Street or P.O. Box:

RECEIVED
DEC 19 2000
IEPA-DLPC

City or Town: | State: | Zip Code:

VII. Ownership *(See instructions)*

A. Name of Installation's Legal Owner

EXELON GENERATION COMPANY LLC

C

Street, P.O. Box, or Route Number: 1400 OPUS PLACE SUITE 900

City or Town: DOWNERS GROVE | State: IL | Zip Code: 60515-5701

Phone Number *(Area Code and Number)*	B. Land Type	C. Owner Type	D. Change of Owner Indicator	Date Changed (Month Day Year)
630-663-5128	P	P	Yes X No	01 01 2001

1/12/01 ah

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to Instructions)*

A. Hazardous Waste Activities

1. Generator (See Instructions)
- [ ] a. Greater than 1000kg/mo (2,200 lbs.)
- [ ] b. 100 to 1000 kg/mo (220-2,200 lbs.)
- [ ] c. Less than 100 kg/mo (220 lbs)

2. Transporter (Indicate Mode in boxes 1-5 below)
- [ ] a. For own waste only
- [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] 5. Other - specify

- [ ] 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Exempt Boiler and/or Industrial Furnace
- [ ] a. Smelting, Melting, and Refining Furnace Exemption
- [ ] b. Small Quantity On-Site Burner Exemption
- [ ] 5. Underground Injection Control

B. Universal Waste Activity

- [ ] Large Quantity Handler of Universal Waste

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Processor
- [ ] b. Re-refiner

- [ ] 3. Off-Specification Used Oil Burner

4. Used Oil Fuel Marketer
- [ ] a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F001	F002	F003	F004	F005	U159
7	**8**	**9**	**10**	**11**	**12**
U211	U226				

B. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s)) 1	2	3	4
X	X	X		D005	D006	D007	D008

C. Other Wastes. *(State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accord ance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inqui ry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the informati on submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant pena lties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
R M Krich	R.M. KRICH DIRECTOR-LICENSING	12/6/00

XI. Comments

ILD 060 862 810

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section IV of the booklet for addresses.)*

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 12/31/02
GSA No. 0246-EPA-OT

ID - For Official Use Only

ILD 060 862 810

IX. Description of Hazardous Wastes *(Continued; Additional Sheet)*

A. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; Use this page only if you need to list more than 12 waste codes.)*

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
49	50	51	52	53	54
55	56	57	58	59	60
61	62	63	64	65	66
67	68	69	70	71	72
73	74	75	76	77	78
79	80	81	82	83	84
85	86	87	88	89	90
91	92	93	94	95	96

B. Toxicity Characteristic Hazardous Wastes. *(See 40 CFR 261.24; Use this page only if you need to list more than 4 waste codes.)*

5	6	7	8	9	10
D009	D027	D034	D035	D039	
11	12	13	14	15	16
17	18	19	20	21	22

USEPA H. Croke

4/18/01

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

April 11, 2001

CERTIFIED MAIL
7099 3400 0002 1429 9139

Exelon Generation Company LLC
Attn: Mr. George Vanderheyden
General Manager, Generation Support
1400 Opus Place Suite 500
Downers Grove, IL 60515

Re: 1610155002 -- Rock Island County
Exelon - Quad Cities Nuclear Power Station
ILD060862810
RCRA Part A Permit
Log No. A-515 - Modification
Received: October 13, 2000; December 26, 2000 and March 15, 2001 (telefax copy)

Dear Mr. Vanderheyden:

This letter is in response to three separate submittals from Kevin K. Hersey dated October 12, 2000; December 20, 2000 and March 12, 2001. The contents of the subject submittals can be summarized as follows:

- **Submittal from Commonwealth Edison (ComEd) dated October 12, 2000 (received October 13, 2000)**
  Submittal informed the Illinois EPA that "Commonwealth Edison and PECO Energy are merging to form a new organization to be named Exelon Corporate", of which Exelon Generation Company LLC (Exelon) is a subsidiary. The tentative date for this reorganization was to be January 1, 2001. Included in this submittal was a partially revised Part A permit application to reflect the new organization and management structure.

- **Submittal from ComEd dated December 20, 2000 (received December 26, 2000)**
  Submittal contained a complete Part A permit application (replacement for the Part A application contained in the October 12, 2000 submittal). In addition, the submittal contained: (1) a photograph of the permitted hazardous waste container storage facility known as "Mixed Waste Storage Building"; (2) Drawing No. FIP-QC-3 showing the location of the permitted hazardous waste container storage area, known as the "Mixed Waste Storage Building", within the above-referenced facility and the location of the

"Radwaste Building"; and (3) a topographic map of the above-referenced facility and surrounding areas.

- **Submittal from Exelon dated March 12, 2001 (received March 15, 2001 by telefax)** Document entitled "Evidence of Authority to Sign Environmental Permits and Other Environmental Related Documents" granting Mr. George Vanderheyden authorization to sign environmental permit applications, permit required reports and other representations regarding environmental requirements. The subject document was signed by Mr. Oliver D. Kingsley, Executive Vice President, Exelon Corporation.

Based on a review of the above-referenced submittals and information previously submitted to the Illinois EPA, the hazardous waste management units subject to RCRA regulation at this facility are: (1) the hazardous waste container storage (S01) area known as the "High Level Bin" area of the facility's Radwaste Building and (2) the hazardous waste container storage (S01) area known as the "Mixed Waste Storage Building". The subject submittals have been reviewed as a request to modify the Part A Permit currently in effect for the above-referenced facility.

In accordance with 35 Ill. Adm. Code 703.155(a)(4), the owner or operator of an interim status facility may make "Changes in the ownership or operational control of a facility if the new owner or operator submits a revised Part A permit application no later than 90 days prior to the scheduled change. When a transfer of ownership or operational control of a facility occurs, the old owner or operator shall comply with the requirements of 35 Ill. Adm. Code 725, Subpart H (financial requirements), until the new owner or operator has demonstrated to the Illinois EPA that it is complying with the requirements of that Subpart. The new owner or operator shall demonstrate compliance with the financial assurance requirements within six months after the date of the change in the ownership or operational control of the facility. Upon demonstration to the Illinois EPA by the new owner or operator of compliance with the financial assurance requirements, the Illinois EPA shall notify the old owner or operator in writing that the old owner or operator no longer needs to comply with 35 Ill. Adm. Code 725, Subpart H as of the date of demonstration. All other interim status duties are transferred effective immediately upon the date of the change of ownership or operational control of the facility."

The Illinois EPA has determined that Exelon has met the requirements of 35 Ill. Adm. Code 703.155(a)(4), (submittal of revised Part A permit application), and hereby approves the modification request. As such, upon completion of the aforementioned transaction and notification to the Illinois EPA that the transaction has been completed, management of mixed wastes may continue under Exelon's operational control at this facility in accordance with the following requirements:

1. Unless specifically modified by this letter, management of hazardous and mixed waste at the above referenced facility shall continue to be in accordance with the Illinois EPA's letter dated November 24, 1997.

2. Page 4 of 7 of EPA Form 8700-23 (Hazardous Waste Permit Application Part A) must be revised to reflect that there are two permitted S01 areas at the above-referenced facility - the "High Level Bin" area of the Radwaste Building and the "Mixed Waste Storage Building". The revised page must be submitted to the Illinois EPA within 30 days from the date of this letter.

3. Management of highly radioactive waste suspected to be RCRA hazardous (D001) in the "High Level Bin" area of the facility's Radwaste Building is subject to the following additional conditions:

   a. Hard copies of weekly inspection reports (including any photographs) must be made available to the Illinois EPA upon request.

   b. A maximum of 550 gallons of mixed waste may be stored in this area.

   c. Wastes subject to RCRA regulations must be stored in drums on containment pallets.

4. Only those mixed wastes which have the EPA Hazardous Waste Numbers D001, D008, D035, D039, F001, F002, F003 and F005 may be stored in the "Mixed Waste Storage Building" while only mixed wastes which has the EPA Hazardous Waste Number D001 may be stored in the "High Level Bin" area of the facility's Radwaste Building, both of which are Hazardous Waste Container Storage (S01) Areas permitted for storage under interim status.

5. Storage of mixed wastes previously not identified in Part A of the permit application is subject to the requirements of 35 Ill. Adm. Code 703.155 (a)(1).

6. The combined maximum storage capacity for mixed waste shall remain at 10,230 gallons.

7. For wastes stored in containers on containment pallets, only compatible waste, as determined by procedures specified in Appendix 2 of the "QUAD CITIES NUCLEAR POWER STATION RCRA FACILITY PLAN: (JUNE 1997)", may be stored on the same containment pallet. Please be advised that the information contained in Appendix 2 should not be intended to be exhaustive. An owner or operator must, as the regulations require, adequately analyze his wastes so that he can avoid creating uncontrolled

substances or reactions of the type listed in Appendix 2, whether they are listed in Appendix 2 or not.

8. Incompatible waste containers must be segregated from other materials or protected from them using a berm, dike or containment wall as required by 35 Ill. Adm. Code 725.277.

9. The management of mixed wastes at this facility must be carried out in accordance with the applicable requirements of 35 ILL. ADM. CODE 702, 703, 705, 721, 722 and 725. This includes the financial assurance requirements of 35 Ill. Adm. Code 725, Subpart H.

Please be advised that Exelon may want to review and update the Quad Cities Nuclear Power Station RCRA Facility Plan. Specifically, the Illinois EPA requests that within 30 days of this letter, Exelon provide detailed closure cost estimates for the two permitted S01 units.

The Illinois EPA requests Exelon to provide a notice of the modification to all persons on the facility mailing list including the appropriate units of State and local government. This notification should be made within ninety (90) calendar days of the date of this letter. A generic facility mailing list has been provided for your use. Please contact Mara McGinnis, Office of Community Relations, at 217/524-3288 for assistance with developing your facility mailing list.

In addition, the Illinois EPA requests that Exelon provide a duplicate copy of the December 20, 2000 submittal. This information is needed for the Illinois EPA's regional field office. Future submittals pertaining to RCRA related matters should include an original copy and two (2) additional copies for distribution to our regional field office and the Illinois EPA reviewer.

As specified in 35 Ill. Adm. Code 703.150(d), Illinois EPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Exelon will have six (6) months (minimum) to submit the application. Once received, the Illinois EPA will begin reviewing this application in accordance with the procedures set forth in 35 Ill. Adm. Code 705.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:JR:bjh\2786s.doc

Enclosure: Generic Facility Mailing List

cc: USEPA Region V -- Harriet Croke
Kevin K. Hersey -- Exelon

USEPA H. Crooke

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

April 11, 2001

CERTIFIED MAIL
7099 3400 0002 1429 9108

Exelon Generation Company LLC
Attn: Mr. George Vanderheyden
General Manager, Generation Support
1400 Opus Place Suite 500
Downers Grove, IL 60515

Re: 0630605014 -- Grundy County
Exelon - Dresden Nuclear Power Station
ILD000665489
RCRA Part A Permit
Log No. A-513 - Modification
Received October 13, 2000; December 26, 2000; January 29, 2001 and March 15, 2001 (telefax copy)

Dear Mr. Vanderheyden:

This letter is in response to four separate submittals from Kevin K. Hersey dated October 12, 2000; December 20, 2000; January 23, 2001 and March 12, 2001. The contents of the subject submittals can be summarized as follows:

- **Submittal from Commonwealth Edison (ComEd) dated October 12, 2000 (received October 13, 2000)**
  Submittal informed the Illinois EPA that "Commonwealth Edison and PECO Energy are merging to form a new organization to be named Exelon Corporate", of which Exelon Generation Company LLC (Exelon) is a subsidiary. The tentative date for this reorganization was to be January 1, 2001. Included in this submittal was a partially revised Part A permit application to reflect the new organization and management structure.

- **Submittal from ComEd dated December 20, 2000 (received December 26, 2000)**
  Submittal contained a complete Part A permit application (replacement for the Part A application contained in the October 12, 2000 submittal). In addition, the submittal contained: (1) Drawing No. B-01A showing the location of two permitted hazardous waste container storage areas (Designated as "Mixed Waste Storage" areas on drawing) within the above-referenced facility" and (2) a topographic map of the above-referenced facility and surrounding areas.

- **Submittal from Exelon dated January 23, 2001 (received January 29, 2001)** Submittal contained three (3) photographs of the permitted hazardous waste container storage facility known as "Mixed Waste Facility".

- **Submittal from Exelon dated March 12, 2001 (received March 15, 2001 by telefax)** Document entitled "Evidence of Authority to Sign Environmental Permits and Other Environmental Related Documents" granting Mr. George Vanderheyden authorization to sign environmental permit applications, permit required reports and other representations regarding environmental requirements. The subject document was signed by Mr. Oliver D. Kingsley, Executive Vice President, Exelon Corporation.

Based on a review of the above-referenced submittals and information previously submitted to the Illinois EPA, the hazardous waste management units subject to RCRA regulation at this facility are: (1) the hazardous waste container storage (S01) area, a 50 ft. x 64 ft. building, known as the "Mixed Waste Facility", and (2) an S01 area consisting of three "Haz-Bin" trailers situated on a concrete pad. This latter S01 area is currently not being used for storage of mixed waste and is subject to RCRA closure requirements. The subject submittals have been reviewed as a request to modify the Part A Permit currently in effect for the above-referenced facility.

In accordance with 35 Ill. Adm. Code 703.155(a)(4), the owner or operator of an interim status facility may make "Changes in the ownership or operational control of a facility if the new owner or operator submits a revised Part A permit application no later than 90 days prior to the scheduled change. When a transfer of ownership or operational control of a facility occurs, the old owner or operator shall comply with the requirements of 35 Ill. Adm. Code 725, Subpart H (financial requirements), until the new owner or operator has demonstrated to the Illinois EPA that it is complying with the requirements of that Subpart. The new owner or operator shall demonstrate compliance with the financial assurance requirements within six months after the date of the change in the ownership or operational control of the facility. Upon demonstration to the Illinois EPA by the new owner or operator of compliance with the financial assurance requirements, the Illinois EPA shall notify the old owner or operator in writing that the old owner or operator no longer needs to comply with 35 Ill. Adm. Code 725, Subpart H as of the date of demonstration. All other interim status duties are transferred effective immediately upon the date of the change of ownership or operational control of the facility."

The Illinois EPA has determined that Exelon has met the requirements of 35 Ill. Adm. Code 703.155(a)(4), (submittal of revised Part A permit application), and hereby approves the modification request. As such, upon completion of the aforementioned transaction and notification to the Illinois EPA that the transaction has been completed, management of mixed wastes may continue under Exelon's operational control at this facility in accordance with the following requirements:

1. Unless specifically modified by this letter, management of hazardous and mixed waste at the above referenced facility shall continue to be in accordance with the Illinois EPA's letter dated November 24, 1997.

2. Only those mixed wastes which have the EPA Hazardous Waste Numbers D001, D002, D004 through D043, and F001 through F005 may be stored in the two (2) hazardous waste container storage (S01) areas permitted for storage under interim status.

3. A maximum of 7,000 gallons of mixed waste may be stored in containers in the storage areas permitted by this permit.

4. Storage of mixed wastes previously not identified in Part A of the permit application is subject to the requirements of 35 Ill. Adm. Code 703.155 (a)(1).

5. Incompatible waste containers must be segregated from other materials or protected from them using a berm, dike or containment wall as required by 35 Ill. Adm. Code 725.277.

6. The management of mixed wastes at this facility must be carried out in accordance with the applicable requirements of 35 Ill. Adm. Code 702, 703, 705, 721, 722 and 725. This includes the financial assurance requirements of 35 Ill. Adm. Code 725, Subpart H.

7. Within 30 days of this letter, Exelon must provide detailed closure cost estimates for the two S01 units permitted for storage under interim status by this permit.

The Illinois EPA requests Exelon to provide a notice of the modification to all persons on the facility mailing list including the appropriate units of State and local government. This notification should be made within ninety (90) calendar days of the date of this letter. A generic facility mailing list has been provided for your use. Please contact Mara McGinnis, Office of Community Relations, at 217/524-3288 for assistance with developing your facility mailing list.

In addition, the Illinois EPA requests that Exelon provide duplicate copies of the December 20, 2000 and January 23, 2001 submittals. This information is needed for the Illinois EPA's regional field office. Future submittals pertaining to RCRA related matters should include an original copy and two (2) additional copies for distribution to our regional field office and the Illinois EPA reviewer.

As specified in 35 Ill. Adm. Code 703.150(d), Illinois EPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Exelon will have six (6) months (minimum) to submit the application. Once received, the Illinois EPA will

begin reviewing this application in accordance with the procedures set forth in 35 Ill. Adm. Code 705.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:JR:bjh\2784s.doc

Enclosure: Generic Facility Mailing List

cc: USEPA Region V -- Harriet Croke
Kevin K. Hersey -- Exelon

US EPA

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1610155002 -- Rock Island County
Commonwealth Edison -- Quad Cities Power Station
ILD060862810
RCRA Permits
Log No. A-425
Date Received: October 31, 1990

December 19, 1990

Commonwealth Edison
Attn: Mr. Thomas E. Hemminger
Post Office Box 767
Chicago, Illinois 60690-0767

Dear Mr. Hemminger:

This letter acknowledges receipt of Part A of the RCRA permit application which was submitted for the Commonwealth Edison Quad Cities Power Station located at 22710 206th Avenue North, Cordova, Illinois. Based upon a review of this application, IEPA has determined that the subject facility qualifies for "interim status", as the requirements of 35 IAC 703.153 have been met. Thus, certain "mixed wastes" (wastes which are both radioactive and RCRA hazardous) may be stored on-site for time periods longer than 90 days in accordance with the following requirements:

1. A maximum of 10,230 gallons of mixed waste may be stored in containers in the storage area identified in Attachment 3 of the application (referred to as "Mixed Waste Storage Location").

2. Only those mixed wastes which have the EPA Hazardous Waste Nos. F003/F005/D001, F002, F005 or D001 may be stored in the container storage area identified in Item 1 above;

3. Management and storage of mixed wastes at this facility must be carried out in accordance with 35 IAC 702, 703, 705, 721, 722 and 725.

4. According to discussions with Judy Freitag, Commonwealth Edison will only store mixed waste in the area identified in Item 1 above for time periods longer than 90 days. Therefore, only those wastes which are both radioactive and RCRA hazardous may be stored in this area for time periods longer than 90 days. Wastes which are RCRA hazardous but not radioactive shall be managed in accordance with the requirements of 35 IAC 722.

As specified in 35 IAC 703.150(b), IEPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Commonwealth Edison will have six (6) months (minimum) to submit the application. Once received, the IEPA will begin reviewing this application in

accordance with the procedures set forth in 35 IAC 705. Until such time as final action is taken on the Part B application, operation of the mixed waste container storage area at this facility will remain subject to the requirements of 35 IAC 725.

If you have any questions regarding this letter, please contact Jim Moore of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:lab/4101n, 14-15

cc: Division File
Peoria Region
USEPA, Region V -- Art Kawatachi
USEPA, Region V -- George Hamper
Planning and Reporting Section
Glenn Savage
Gary King
Division of Legal Counsel
IDNS, Joe Klinger

Commonw h Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

October 4, 1982

RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690-3587
Attn: Karl J. Klepitsch, Chief
Waste Management Branch

Subject: Improper Notification of TSD Activity
Facility I.D. Number: ILD 060862810

Dear Mr. Klepitsch:

In response to your letter of September 28, 1982 we wish to inform you that Commonwealth Edison's Quad Cities Station in Cordova, Illinois, U.S. EPA Facility I.D. Number ILD 060862810 is not in fact a hazardous waste treatment, storage or disposal (TSD) facility. This facility was erroneously identified as a TSD facility on this facility's notification of hazardous waste activity. Because this facility is not a TSD, we will not be submitting a Part A application.

Should you have any questions regarding this matter, please call Angela Jankousky of my staff at 312/294-4458.

Sincerely,

Thomas E. Hemminger
Director of Water Quality

0599E
ALJ:TEH:pp

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD060862810 REACKNOWLEDGEMENT

COMMONWEALTH EDISON CO QC GEN STA
PO BOX 767 ROOM 1700E
CHICAGO IL 60690

INSTALLATION ADDRESS

NORTH ON RTE 84
CORDOVA IL 61242

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only. GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

002003 AUG 25 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F ILD060862810 T/A 21	A	80 08 18

Commonwealth Edison Co
Q.C. Gen. Sta.

I. NAME OF INSTALLATION

QUAD CITIES GENERATING STATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 767, ROOM 1700E

CITY OR TOWN: 4 CHICAGO — ST.: IL — ZIP CODE: 61244

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 NORTH ON RTE 84

CITY OR TOWN: 6 CORDOVA — ST.: IL — ZIP CODE: 61242

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 HEMMINGER THOMAS

PHONE NO. *(area code & no.)*: 312-294-4433

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 COMMONWEALTH EDISON COMPANY

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD060862810

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 20 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	I	L	D	0	6	0	8	6	2	8	1	0	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F002				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☒ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
J. W. Johnson	J. W. Johnson Vice President	8/14/80

Commonwealth Edison Company
125 South Clark Street
P.O. Box 767
Chicago, IL 60690-0767

A 499 - A 504

cc: Peoria

USEPA

ComEd

August 5, 1997

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Division of Land Pollution Control
Permits Section
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Subject: Copy of RCRA Facility Plan for ComEd's Quad Cities Station and Revised Permit Applications for ComEd Mixed Waste Facilities

Reference: Illinois EPA Log No. A-425

Dear Mr. Kuhn:

As requested, Commonwealth Edison (ComEd) is submitting a copy of the RCRA Facility Plan for Quad Cities Station for the Agency's records. Also enclosed are revised permit applications for all six ComEd mixed waste storage facilities.

Please note that the application for Zion Station (IEPA Log No. A-426) contains additional waste codes. The original waste code F001 was assigned using process knowledge of the waste in storage. Subsequent laboratory analysis has determined that additional waste codes apply to this same waste.

If you have any questions or comments regarding this submittal, please call me at (312) 394-4453.

Sincerely,

Grayce Majewski

Grayce Majewski
Principal Environmental Engineer
Environmental Services Department

Approval: Brian McCann

GLM:bg\31-qperm.doc

A499

cc: Reona (ISEPA)

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

For EPA Regional Use Only			
Date Received	Month	Day	Year

EPA

United States Environmental Protection Agency
Washington, DC 20460

Hazardous Waste Permit Application Part A

(Read the Instructions before starting)

RECEIVED
AUG 11 1997
IEPA-BOL
PERMIT SECTION

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

[ ] A. First Part A Submission

[X] B. Part A Amendment # Log #A-425

C. Installation's EPA ID Number: ILD060862810

D. Secondary ID Number *(If applicable)*:

II. Name of Facility: COMED QUAD CITIES STATION

III. Facility Location *(Physical address not P.O. Box or Route Number)*

A. Street: 22710 206TH AVE. NORTH

Street *(Continued)*:

City or Town: CORDOVA

State: IL

Zip Code: 61242-0216

County Code *(If known)*:

County Name: ROCK ISLAND

B. Land Type (Enter code): P

C. Geographic Location

LATITUDE (Degrees, Minutes, & Seconds): 41 43 03 0

LONGITUDE (Degrees, Minutes & Seconds): 090 18 04 0

D. Facility Existence Date **

Month: 07 Day: 06 Year: 1987

IV. Facility Mailing Address

Street or P.O. Box: PO BOX 767 ROOM 35 FNW

City or Town: CHICAGO

State: IL

Zip Code: 60690-0767

V. Facility Contact *(Person to be contacted regarding waste activities at facility)*

Name *(Last)*: O'TOOLE

(First): MARY F.

Job Title: ENV. MANAGER

Phone Number *(Area Code and Number)*: 312-394-4430

VI. Facility Contact Address *(See instructions)*

A. Contact Address Location [ ] Mailing [X] Other [ ]

B. Street or P.O. Box:

City or Town:

State:

Zip Code:

** Note for the existing facility, mixed waste has been controlled at this facility since July 6, 1987. However, mixed waste was not regulated until IEPA received authority on May 1, 1990, effective November 1, 1990.

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 9-30-96
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*: ILD060862810

Secondary ID Number *(Enter from page 1)*:

VII. Operator Information *(See instructions)*

Name of Operator: COMMONWEALTH EDISON COMPANY

Street or P.O. Box: P O BOX 767 ROOM 35FNW

City or Town: CHICAGO | State: IL | ZIP Code: 60690-0767

Phone Number *(Area Code and Number)*: 312-394-4430

B. Operator Type: P

C. Change of Operator Indicator: Yes [ ] No [X]

Date Changed: Month Day Year

VIII. Facility Owner *(See instructions)*

A. Name of Facility's Legal Owner: COMMONWEALTH EDISON COMPANY

Street or P.O. Box: P O BOX 767 ROOM 35FNW

City or Town: CHICAGO | State: IL | ZIP Code: 60690-0767

Phone Number *(Area Code and Number)*: 312-394-4430

B. Owner Type: P

C. Change of Owner Indicator: Yes [ ] No [X]

Date Changed: Month Day Year

IX. SIC Codes *(4-digit, in order of significance)*

Primary	Secondary
4911 (Description) Electric Services	(Description)
Secondary	**Secondary**
(Description)	(Description)

X. Other Environmental Permits *(See instructions)*

A. Permit Type *(Enter code)*	B. Permit Number	C. Description
N	IL0000503 7	NPDES Permit
R	LOG NO. A-425	RCRA Part A Permit
E	7302083 2	General Air Operating Permit
E	1994SC0507	Sewage Sludge Land Application Permit

EPA I.D. Number *(Enter from page 1)*

I	L	D	0	6	0	8	6	2	8	1	0

Secondary ID Number *(Enter from page 1)*

XI. Nature of Business *(Provide a brief description)*

Generation of electricity using nuclear fuel.

XII. Process Codes and Design Capacities

A. **PROCESS CODE** - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.*

B. **PROCESS DESIGN CAPACITY** - *For each code entered in column A, enter the capacity of the process.*
1. **AMOUNT** - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*
2. **UNIT OF MEASURE** - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. **PROCESS TOTAL NUMBER OF UNITS** - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G
Gallons Per Hour	E
Gallons Per Day	U
Liters	L
Liters Per Hour	H
Liters Per Day	V
Short Tons Per Hour	D
Metric Tons Per Hour	W
Short Tons Per Day	N
Metric Tons Per Day	S
Pounds Per Hour	J
Kilograms Per Hour	R
Cubic Yards	Y
Cubic Meters	C
Acres	B
Acre-feet	A
Hectares	Q
Hectare-meter	F
Btu's Per Hour	I

EPA I.D. Number *(Enter from page 1)*: I L D 0 6 0 8 6 2 8 1 0

Secondary ID Number *(Enter from page 1)*:

XII. Process Codes and Design Capabilities *(Continued)*

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. PROCESS DESIGN CAPACITY 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only
X 1	S 0 2	5 3 3 7 8 8	G	0 0 1	
1	S 0 1	10,230 . 00	G	001	
2		.			
3		.			
4		.			
5		.			
6		.			
7		.			
8		.			
9		.			
10		.			
11		.			
12		.			
13		.			

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes *(Follow instructions from item XII for D99, S99, T04 and X99 process codes)*

Line Number (Enter #s in seq w/XII)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	B. PROCESS DESIGN CAPACITY 2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Process
X 1	T 0 4				In-situ Vitrification
1		.			
2		.			
3		.			
4		.			

EPA I.D. Number *(Enter from page 1)*

I	L	D	0	6	0	8	6	2	8	1	0

Secondary ID Number *(Enter from page 1)*

XIV. Description of Hazardous Wastes

A. **EPA HAZARDOUS WASTE NUMBER** - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. **ESTIMATED ANNUAL QUANTITY** - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C **UNIT OF MEASURE** - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. **PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D(1).*
3. *Enter in the space provided on page 7, item XIV-E, the line number and the additional code(s).*

2. PROCESS DESCRIPTION: *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)	D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3 D 8 0	
X 2	D 0 0 2	400	P	T 0 3 D 8 0	
X 3	D 0 0 1	100	P	T 0 3 D 8 0	
X 4	D 0 0 2				Included With Above

EPA I.D. Number *(Enter from page 1)*: I L D 0 6 0 8 6 2 8 1 0

Secondary ID Number *(Enter from page 1)*:

XIV. Description of Hazardous Wastes *(Continued)*

Line Number	A. EPA HAZARDOUS WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	D001	19,800	P	S01	
2	D001	2,750	P	S01	
3	D008				included with above
4	D035				included with above
5	D039				included with above
6	D001	29,150	P	S01	
7	F003				included with above
8	F005				included with above
9	D008	550	P	S01	
10	F002	8,800	P	S01	
11	F001				included with above
12	D001				included with above
13	F003	19,250	P	S01	
14	F005				included with above
15	D001				included with above
16	F005	550	P	S01	
17	F002	11,850	P	S01	
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
I L D 0 6 0 8 6 2 8 1 0	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

(Same as previous)

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

(Same as previous)

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

(Same as previous)

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature *Louis DelGeorge*	Date Signed 8-6-97
Name and Official Title (Type or print) Louis O. DelGeorge, Vice President	
Owner Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

March 16, 1993

CERTIFIED MAIL

Lawrence W. Eastep, P.E. Manager
Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
P.O. Box 19276
Springfield, Illinois 62794-9276

Subject: RCRA Interim Status Permit Application
Quad Cities Nuclear Power Station (ILD060862810)

Dear Mr. Eastep:

Enclosed is a revision to the RCRA Interim Status Application for Quad Cities Station. This revision concerns EPA codes.

In 1992, in preparation for shipping mixed waste to a disposal facility, the waste was repackaged and waste streams were consolidated. Also, additional waste analyses of the mixed waste were reviewed and additional waste codes were assigned to the appropriate drums. Attached is a summary of the revised codes and quantities.

Specifically, we are requesting a revision to requirement No. 2 of the Agency's "interim status" acknowledgement correspondence dated December 19, 1990, for Quad Cities Station (copy attached). Basically, we would like to see this requirement have some flexibility to handle these additional hazardous waste codes and others that may have to be assigned in the future.

We had hoped to have the liquid form of Quad Cities' mixed waste sent to Diversified Scientific Services Inc. (DSSI) of Kingston, Tennessee in 1992. However, due to processing delays, disposal has been pushed back. As I am sure you are aware, a nation wide lack of available treatment storage and disposal of its mixed waste.

If you have any questions or require additional information concerning this matter, please contact Grayce Majewski of my staff at 312/294-4453.

Sincerely,

Brian M. McCann
Supervisor of Land Quality

5114o
SPS:BMM:bg

cc: George J. Hamper, USEPA
Jim Moore, IEPA

The following is Mixed Waste Inventory

Paint Sludge under D001, D008, D035, D039

110 Gallons D001, D035
110 Gallons D001
55 Gallons D001, D008, D035, D039
55 Gallons D001, D008
55 Gallons D035

Total 385 Gallons

Paint Sludge under D001, F005

2,310 Gallons D001, F005
55 Gallons F005

Total 2,365 Gallons

Paint Thinner under F003, F005, D001 Total of 770 Gallons

Naphta D001 Total of 1,265 Gallons

Oil/Solvents under D001, F003, F005 Total of 275 Gallons

Freons under F001, F002

605 Gallons F001, F002
816 Gallons F002

Total 1,421 Gallons

TOTAL MIXED INVENTORY 6,481 Gallons

Illinois Environmental Protection Agency · P. O. Box 19276. Springfield. IL 62794-9276

217/782-6762

Refer to: 1610155002 -- Rock Island County
Commonwealth Edison -- Quad Cities Power Station
ILD060862810
RCRA Permits
Log No. A-425
Date Received: October 31, 1990

December 19, 1990

Commonwealth Edison
Attn: Mr. Thomas E. Hemminger
Post Office Box 767
Chicago, Illinois 60690-0767

Dear Mr. Hemminger:

This letter acknowledges receipt of Part A of the RCRA permit application which was submitted for the Commonwealth Edison Quad Cities Power Station located at 22710 206th Avenue North, Cordova, Illinois. Based upon a review of this application, IEPA has determined that the subject facility qualifies for "interim status", as the requirements of 35 IAC 703.153 have been met. Thus, certain "mixed wastes" (wastes which are both radioactive and RCRA hazardous) may be stored on-site for time periods longer than 90 days in accordance with the following requirements:

1. A maximum of 10,230 gallons of mixed waste may be stored in containers in the storage area identified in Attachment 3 of the application (referred to as "Mixed Waste Storage Location").

2. Only those mixed wastes which have the EPA Hazardous Waste Nos. F003/F005/D001, F002, F005 or D001 may be stored in the container storage area identified in Item 1 above;

3. Management and storage of mixed wastes at this facility must be carried out in accordance with 35 IAC 702, 703, 705, 721, 722 and 725.

4. According to discussions with Judy Freitag, Commonwealth Edison will only store mixed waste in the area identified in Item 1 above for time periods longer than 90 days. Therefore, only those wastes which are both radioactive and RCRA hazardous may be stored in this area for time periods longer than 90 days. Wastes which are RCRA hazardous but not radioactive shall be managed in accordance with the requirements of 35 IAC 722.

As specified in 35 IAC 703.150(b), IEPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Commonwealth Edison will have six (6) months (minimum) to submit the application. Once received, the IEPA will begin reviewing this application in

accordance with the procedures set forth in 35 IAC 705. Until such time as final action is taken on the Part B application, operation of the mixed waste container storage area at this facility will remain subject to the requirements of 35 IAC 725.

If you have any questions regarding this letter, please contact Jim Moore of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:lab/4101n, 14-15

cc: Division File
Peoria Region
USEPA, Region V -- Art Kawatachi
USEPA, Region V -- George Hamper
Planning and Reporting Section
Glenn Savage
Gary King
Division of Legal Counsel
IDNS, Joe Klinger

B. Permit Application /Post Permit

A494

Commonwealth Edison Company
125 South Clark Street
P.O. Box 767
Chicago, IL 60690-0767

cc: Peoria USEPA

Bill JFK

March 25, 1997

CERTIFIED MAIL

Mr. Jerry Kuhn
Illinois Environmental Protection Agency
Bureau of Land, Permits Section
2200 Churchill Road
Springfield, Illinois 62794-9276

Subject: RCRA Part A Modification - ComEd Quad Cities Station
U.S. EPA I.D. # ILD060862810, IEPA I.D. #1610155002
IEPA Log No. A-425

Dear Mr. Kuhn:

As discussed between you and Grayce Majewski of my staff, Commonwealth Edison Company (ComEd) is submitting the attached modification to the RCRA Part A Permit for Quad Cities Station.

The existing permit allows Quad Cities Station to store up to 10,230 gallons of mixed waste in the station's Mixed Waste Building. Recently, three (3) highly radioactive drums containing paint waste were generated (total volume approximately 78 gallons). It is suspected that the waste is RCRA hazardous, although this can not be confirmed at this time. Due to their high radioactivity levels, these drums require special shielding and can not be placed in the station's existing permitted Mixed Waste Building. They are currently being stored inside the station's Radwaste Building in an area known as the "high level bin." ComEd is requesting that this storage area be added to the existing RCRA Part A permit.

If you have any questions regarding the submitted information, please contact Grayce Majewski of my staff at (312) 394-4453.

Sincerely,

Brian M McCann

Brian M. McCann
Supervisor of Land Quality
Environmental Services Department

GLM:BMM:bg\24-quad.doc

In accordance with 35 Ill. Admin. Code (IAC) 703.282, Commonwealth Edison Company (ComEd) submits the following Class 2 modification for Quad Cities Station:

Description of Change to Permit Conditions

Three (3) drums of highly radioactive paint waste (approximately 78 gallons total volume) were generated on January 21, 1997 and are suspected to be RCRA hazardous, EPA waste code D001. The waste was generated as a result of regular painting and maintenance of the steam suppression chamber inside the reactor building. Due to high radioactivity levels, these drums require special shielding and can not be placed in the station's existing permitted Mixed Waste Building (see attached copy of permit, dated December 19, 1990). The drums are currently being stored inside the station's Radwaste Building in an area known as the "high level bin" in accordance with the requirements of 35 IAC 725, "Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities."

ComEd believes that this qualifies as an appropriate cause for permit modification under 35 IAC 703.271(a) and is requesting that this additional storage area be added to the existing RCRA Part A permit.

Class 2 Modification

ComEd believes this permit modification is classified as Class 2 per 35 IAC 703 Appendix A, paragraph (M)(1)(b). We request the addition of a containment building unit, however, we do not request an increase in unit capacity.

Description of Additional Storage Area

General Description. The new proposed area is located within the station's Radwaste Building where radioactive wastes are managed prior to shipment offsite for disposal. The three suspected high level mixed waste drums are stored on containment pallets in a corner of the building's Dry Active Storage Room (also known as the High Level Bin).

See Attachment 1 for a general ground floor plan of Quad Cities Station, including the Radwaste Building. The proposed mixed waste storage area is highlighted in yellow. See also Attachment 2 for a schematic layout of the High Level Bin. Also, an aerial photograph and a map of Quad Cities Station are included as Attachments 3 and 4,

showing the relative locations of the Radwaste Building and the existing Mixed Waste Building.

Unit Description

The High Level Bin is a 20 ft by 12 ft room with 3/4 walls and primed and painted concrete surfaces. There are no floor drains -- leaks or spills will be prevented by the containment pallets (110 gallon capacity) on which the three drums are stored. In addition, the containment pallets will separate the three mixed waste drums from any potentially incompatible wastes that might be also stored in the room.

Security

Entry to the High Level Bin is secured by a locked door controlled by the station's Radiation Protection Department. Personnel may only gain entrance to the room by signing out a special "high level key" and being accompanied by a Radiation Protection Technician.

Inspections

Due to high radiation dose concerns, direct inspection of the drums is limited to whenever entry to the High Level Bin is allowed by the Radiation Protection Department. Indirect inspections can be performed using a mirror or ladder to look over the 3/4 wall. A remote camera is currently being installed in the area to aid weekly inspection while not subjecting personnel to unnecessary radiation doses. See Attachment 5 for an example of the Mixed Waste Weekly Inspection Form.

RCRA Facility Plan

The Quad Cities Station RCRA Facility Plan is currently being updated to include the new mixed waste storage area in the High Level Bin. The Facility Plan includes the following: Use and Management of Containers, Preparedness and Prevention Plan, Contingency Plan and Emergency Procedures. Upon completion of the update, a copy of the RCRA Facility Plan will be submitted to the Agency.

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: 1610155002 -- Rock Island County
Commonwealth Edison -- Quad Cities Power Station
ILD060862810
RCRA Permits
Log No. A-425
Date Received: October 31, 1990

December 19, 1990

Commonwealth Edison
Attn: Mr. Thomas E. Hemminger
Post Office Box 767
Chicago, Illinois 60690-0767

Dear Mr. Hemminger:

This letter acknowledges receipt of Part A of the RCRA permit application which was submitted for the Commonwealth Edison Quad Cities Power Station located at 22710 206th Avenue North, Cordova, Illinois. Based upon a review of this application, IEPA has determined that the subject facility qualifies for "interim status", as the requirements of 35 IAC 703.153 have been met. Thus, certain "mixed wastes" (wastes which are both radioactive and RCRA hazardous) may be stored on-site for time periods longer than 90 days in accordance with the following requirements:

1. A maximum of 10,230 gallons of mixed waste may be stored in containers in the storage area identified in Attachment 3 of the application (referred to as "Mixed Waste Storage Location").

2. Only those mixed wastes which have the EPA Hazardous Waste Nos. F003/F005/D001, F002, F005 or D001 may be stored in the container storage area identified in Item 1 above;

3. Management and storage of mixed wastes at this facility must be carried out in accordance with 35 IAC 702, 703, 705, 721, 722 and 725.

4. According to discussions with Judy Freitag, Commonwealth Edison will only store mixed waste in the area identified in Item 1 above for time periods longer than 90 days. Therefore, only those wastes which are both radioactive and RCRA hazardous may be stored in this area for time periods longer than 90 days. Wastes which are RCRA hazardous but not radioactive shall be managed in accordance with the requirements of 35 IAC 722.

As specified in 35 IAC 703.150(b), IEPA will in the future request that Part B of the RCRA permit application be submitted for review and approval. At that time, Commonwealth Edison will have six (6) months (minimum) to submit the application. Once received, the IEPA will begin reviewing this application in

accordance with the procedures set forth in 35 IAC 705. Until such time as final action is taken on the Part B application, operation of the mixed waste container storage area at this facility will remain subject to the requirements of 35 IAC 725.

If you have any questions regarding this letter, please contact Jim Moore of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

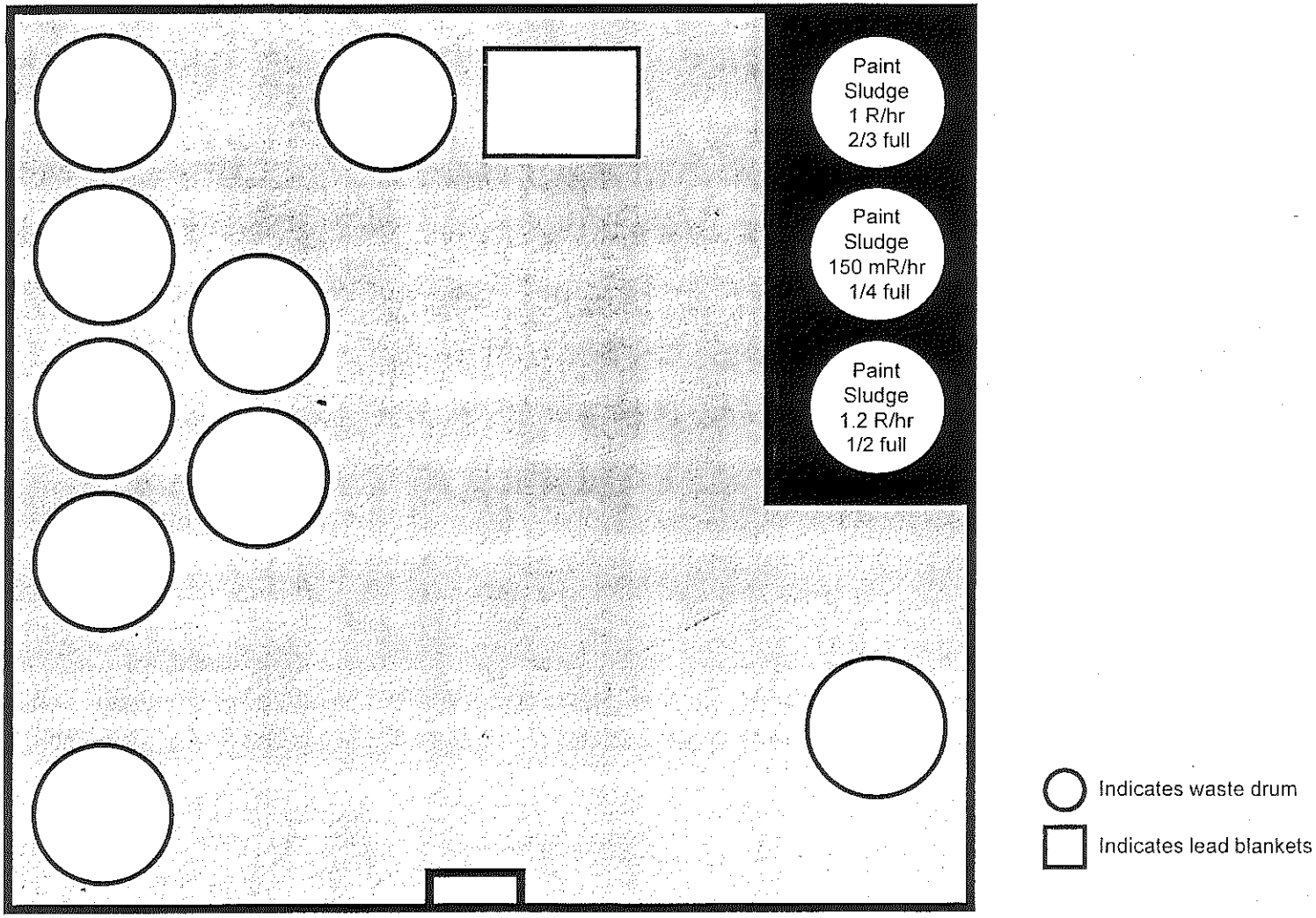
LWE:JKM:lab/4101n, 14-15

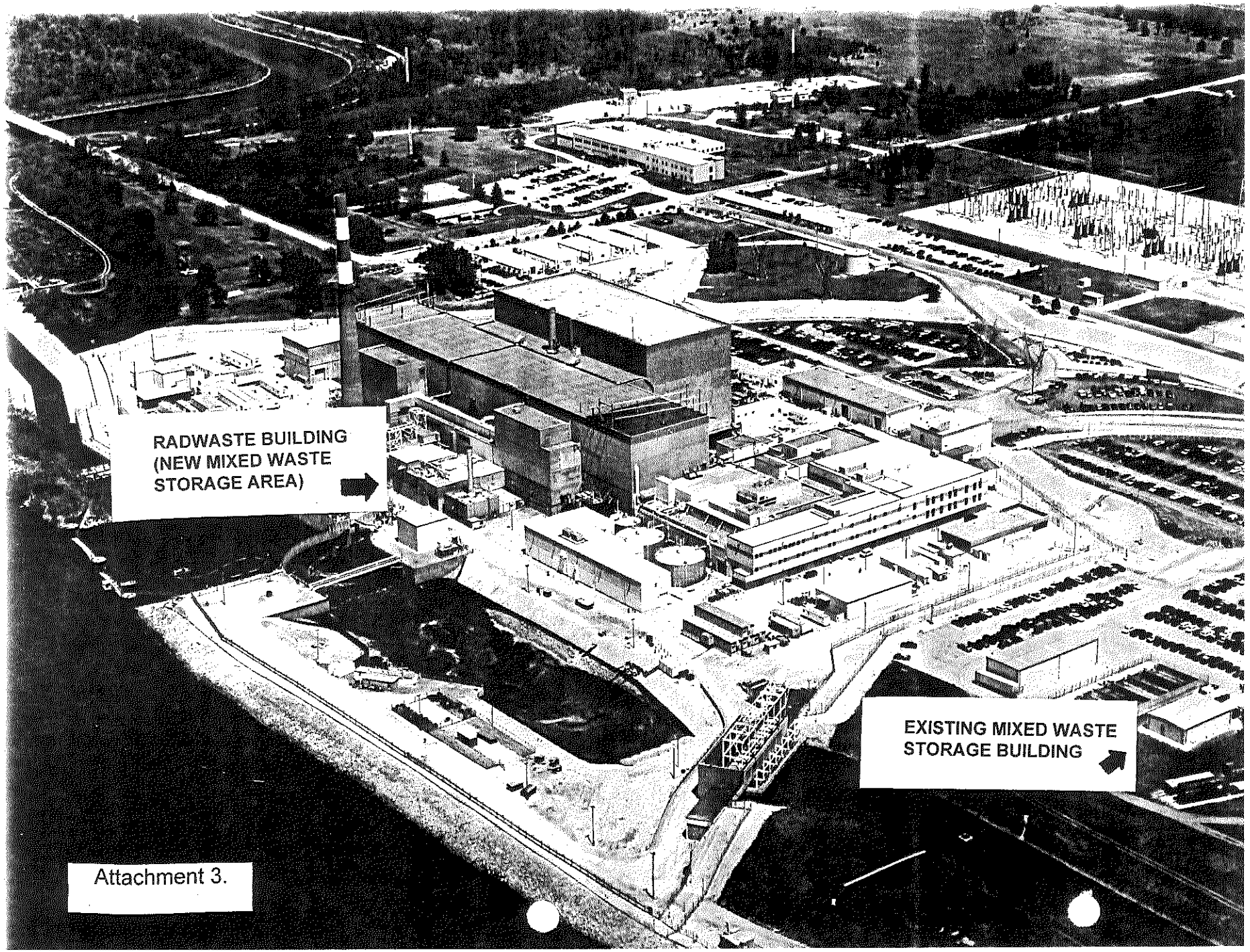
cc: Division File
Peoria Region
USEPA, Region V -- Art Kawatachi
USEPA, Region V -- George Hamper
Planning and Reporting Section
Glenn Savage
Gary King
Division of Legal Counsel
IDNS, Joe Klinger

Attachment 2.

Proposed Additional Mixed Waste Storage Area

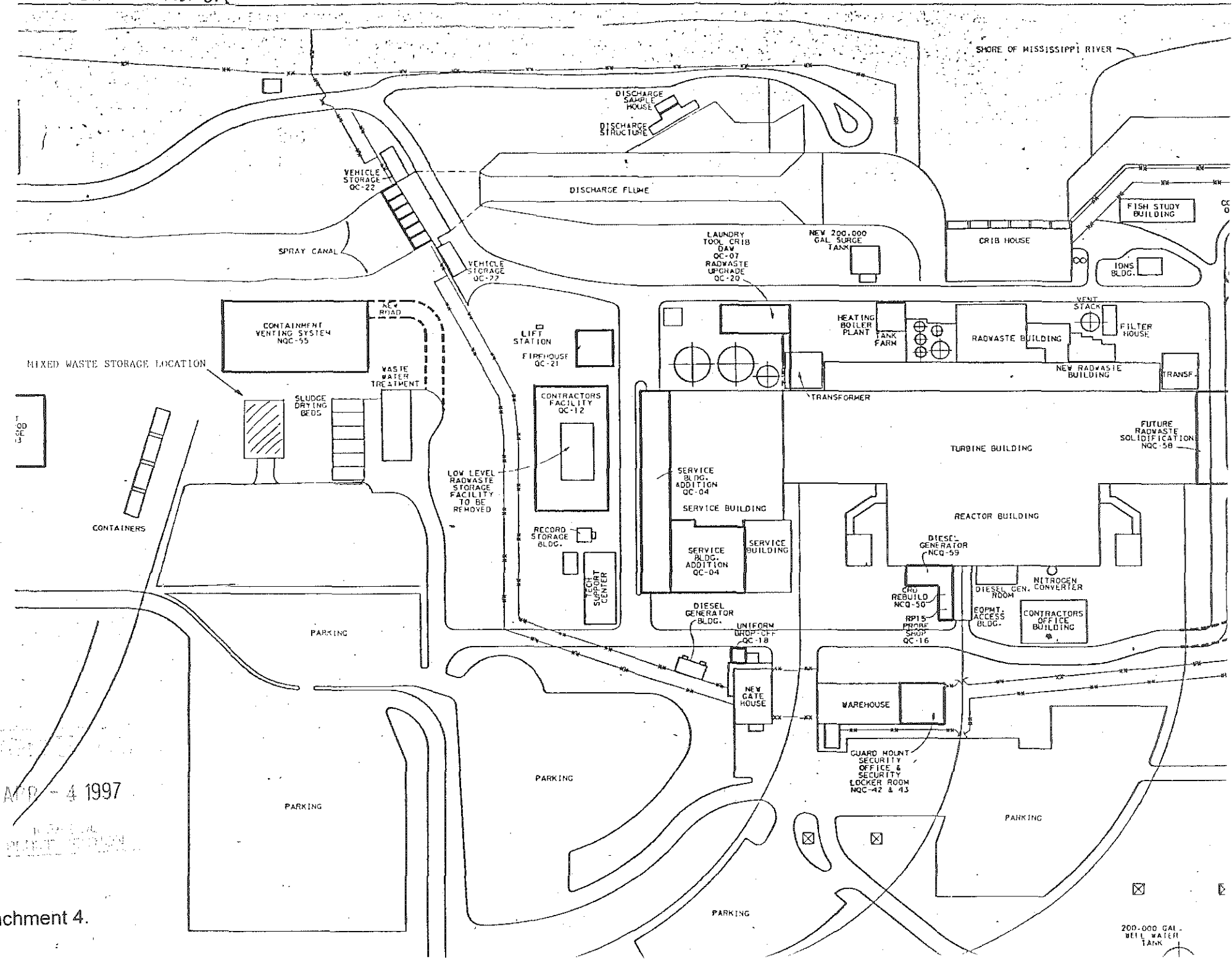
(Schematic Layout of High Level Radwaste Bin as of 25-Jan-97)





Attachment 3.

Quad Cities Station



APR - 4 1997

Attachment 4.

Attachment 5.

ATTACHMENT C (Page 1 of 1)

WEEKLY MIXED WASTE STORAGE AREA INSPECTION

WEEK OF:		TIME:	
DATE:	INSPECTED BY:		
STORAGE OF MIXED WASTE			
STORAGE AREA LOCATION:			
NUMBER OF WASTE CONTAINERS AT THIS LOCATION:			
CONTAINER(S) LABELED MIXED WASTE:		YES	NO*
CONTAINER(S) IN GOOD CONDITION:		YES	NO*
CONTAINER(S) LEAKING:		YES*	NO
CONTAINER(S) COMPLETELY CLOSED?		YES	NO*
AREA PHONE OPERATING?		YES	NO*
FIRE EXTINGUISHER INSPECTION CURRENT?		YES	NO*
LIGHTS WORKING?		YES	NO*
BUILDING TEMPERATURE GREATER THAN 40°F?		YES	NO*
SECONDARY SPILL CONTAINMENT EMPTY?		YES	NO*
SPILL EQUIPMENT AVAILABLE?		YES	NO*
BUILDING CONDITION/AREA ADEQUATE?(Check berms, sumps etc)		YES	NO*
BUILDING LOCK FUNCTIONING?		YES	NO*
CORRECTIVE ACTIONS REQUIRED?		YES**	NO

* Report immediately to RCRA Coordinator or designated alternate and complete the following after corrective actions are performed.

** Corrective Action: Document problem, corrective actions performed, date and initials when corrective actions completed.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276, 217-782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601, 312-814-6026

ROD R. BLAGOJEVICH, GOVERNOR RENEE CIPRIANO, DIRECTOR

217/524-3300

March 26, 2004

Exelon Generation Company LLC
Attn: Mr. Keith Jury
Director Licensing and Regulatory Affairs
4300 Winfield Road
Warren, IL 60555

Re: 1610155002 -- Rock Island County
Exelon - Quad Cities Nuclear Power Station
ILD060862810
Log No. PS02-120
Received July 8, 2002 and November 19, 2002
RCRA Permit File

Dear Mr. Jury:

Based on a review of information previously submitted to the Illinois EPA, the hazardous waste management units subject to RCRA regulation at the above-referenced facility are the hazardous waste container storage (S01 unit) area known as the "Mixed Waste Storage Building" and the S01 "High Level Bin" area in the "Radwaste Building Facility". Exelon's Quad Cities Nuclear Power Station (Quad Cities Station) has a Part A application and has been operating under interim status for the purpose of storing mixed waste while disposal outlets were identified.

This is in response to two separate letters regarding Exelon Generation Company LLC's request for conditional exemption for Low-Level Mixed Waste (LLMW) Storage, Treatment, Transportation and Disposal in accordance with 40 CFR 266, Subpart N (35 Ill. Adm. Code 726, Subpart N) at the above-referenced facility. The contents of the subject submittals can be summarized as follows:

- **Letter from C.N. Swenson on behalf of the above-referenced facility (Quad Cities Station) dated July 3, 2002 and received July 8, 2002 by the Illinois EPA.**

  Letter requested conditional exemption for waste codes D001, D008, D035, D039, F001, F002, F003, and F005. Letter stated that "We are currently in compliance with Title 35 Illinois Administrative Code Part 726, Subpart N." In addition, letter requested that the Illinois EPA "...provide instruction on the protocol for relinquishing the Part A Interim Status."

- **Submittal from Dave Wozniak of Exelon Generation dated November 14, 2002 and received November 19, 2002.**

  Letter contains support documentation for Exelon's contention that attachment of drum heaters to LLMW drums for treatment by heating (drying) drum contents is not intended to be regulated under RCRA. In addition, the letter states that "...RCRA container storage locations have not been utilized in the past for the storage of hazardous wastes for periods exceeding 90 days."

Based on a review of the subject submittals, it appears that Exelon's Quad Cities Station has met the requirements of 35 Ill. Adm. Code 726.320 – Storage and Treatment Conditional Exemption; 35 Ill. Adm. Code 726.325 – Wastes Eligible for a Storage and Treatment Conditional Exemption for Low-Level Mixed Waste; 35 Ill. Adm. Code 726.330 – Conditions to Qualify for and Maintain a Storage and Treatment Conditional Exemption and 35 Ill. Adm. Code 726.335 – Treatment Allowed by a Storage and Treatment Conditional Exemption (the proposal to treat waste in containers by attaching drum heaters to the LLMW containers appears to be consistent with the types of treatment NRC currently allows in a tank or container). Likewise, it appears that in accordance with 35 Ill. Adm. Code 726.360 – Applicability of Closure Requirements to Storage Units, the 2 above-referenced S01 units are not subject to the closure requirements of 35 Ill. Adm. Code 725. As such, Exelon's Quad Cities Station is exempt from RCRA storage and treatment requirements as long as the waste is generated under a single Nuclear Regulatory Commission (NRC) license, meets the applicable conditions specified in 35 Ill. Adm. Code 726 Subpart N, and is stored and treated in a tank or container.

In addition, Exelon Quad Cities Station's LLMW, identified as D001, D008, D035, D039, F001, F002, F003, and F005, which meet applicable treatment standards identified in 35 Ill. Adm. Code 726 Subpart N, may be conditionally exempt from RCRA transportation and disposal requirements. This waste may be disposed of at low-level radioactive waste disposal facilities which are licensed by NRC. 35 Ill. Adm. Code 726 Subpart N also provides additional flexibility for manifesting these wastes when they are destined for disposal at such facilities. Although mixed waste meeting the applicable conditions is exempt from certain RCRA requirements, it must still be managed as radioactive waste according to NRC regulations.

As long as Exelon's Quad Cities Station is in compliance with the conditions specified in 35 Ill. Adm. Code 726 Subpart N, the LLMWs identified as D001, D008, D035, D039, F001, F002, F003, and F005 are eligible for conditional exemption from RCRA regulations for Storage, Treatment, Transportation and Disposal.

Please be advised that should Exelon's Quad Cities Station fail to meet any of the conditions specified in 35 Ill. Adm. Code 726.330, it will automatically lose it's storage and treatment conditional exemption and be subject to the conditions specified in 35 Ill. Adm. Code 726.340 (i.e., waste that failed conditions must be managed as a RCRA hazardous waste and the storage unit storing the LLMW becomes subject to RCRA hazardous waste container storage requirements). Procedures for reclaiming a lost storage and treatment conditional exemption are specified in 35 Ill. Adm. Code 726.345.

Likewise, should Exelon's Quad Cities Station fail to meet any of the conditions specified in 35 Ill. Adm. Code 726.415, it will automatically lose it's transportation and disposal conditional exemption and be subject to the conditions specified in 35 Ill. Adm. Code 726.455. Procedures for reclaiming a lost transportation and disposal conditional exemption are specified in 35 Ill. Adm. Code 726.460.

In summary, to maintain the conditional exemptions for storage, treatment, transportation and disposal of its LLMW, Exelon's Quad Cities Station must continue to meet the requirements set forth in 35 Ill. Adm. Code 726 Subpart N. In addition, Exelon's Quad Cities Station must comply with the requirements of 35 Ill. Adm. Codes 726.350, 726.355, 726.415, 726.420, 726.425, 726.430, 726.435, 726.440, 726.445 and 726.450.

Should you have any questions concerning this matter, please feel free to contact John Riekstins of my staff at 217/524-3309.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:JR/mls/042841s.doc
JR, MM

cc: USEPA Region V -- Harriet Croke
Kevin K. Hersey -- Exelon

1907

Date: 12-27-89

Comp

To: Valdas V. Adamkus
Regional Administrator
USEPA
237 S. Dearborn Street
Chicago, Ill. 60604

mac 699723

Re: Soft Hammer Demonstration and Certification for

Name: Commonwealth Edison Quad Cities Station EPA ID No.: ILD 000812810

Address: Rt 84

Cordova Ill. 61242 Phone No.: 309-654-2241

Dear Sir:

The Land Disposal Restrictions (40 CFR Part 268) prohibit the land disposal of listed hazardous wastes which do not meet treatment standards specified by the US EPA. 40 CFR 268.8(a) requires generators of "soft-hammer" wastes (First- and Second-Third wastes for which no treatment standard has yet been established) to:

(1) Make a good faith effort to locate and contract with treatment and recovery facilities which use the practically-available technology which yields the greatest environmental benefit, and

(2) Submit appropriate documentation of that effort to the EPA Regional Administrator.

This letter is intended to serve as a soft-hammer demonstration and certification for the following waste streams:

EPA Waste Code & Description	EPA Waste Code & Description	EPA Waste Code & Description
U226 111-Trichloroethane		

All of the soft-hammer waste streams noted above are "U" or "P" code hazardous wastes which, by definition, are commercial chemical products intended to be discarded. These wastes were generated as the result of a laboratory cleanout operation conducted on our behalf by Clean Harbors of Chicago, Inc. None of the wastes included above are spent solvent (F001-F005) or dioxin (F020-F028) wastes.

Clean Harbors of Natick, Inc. has contacted the following hazardous waste treatment and recovery facilities on our behalf and, based on those inquiries, determined that incineration is the best practically-available treatment method for above-described waste streams. In no case will any of the above-listed wastes (or residues) be disposed or treated in a land disposal unit in excess of the California List prohibition levels.

Land Ban Certification
1989

1. Clean Harbors of Braintree, Inc.
   385 Quincy Avenue
   Braintree, MA 02184 (617) 849-1807
   Contact: Doug Lanich (7/14/89): "All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material."

2. Trade Waste Incineration
   7 Mobile Avenue
   Sauget, IL 62201 (618) 271-2804
   Contact: Dennis Warchol (7/14/89): "Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration"

3. EMSCO, Inc.
   American Oil Road
   El Dorado, AR 71730 (501) 223-4160
   Contact: Eva Dodd (7/14/89): "All material is incinerated on site. Incineration is the best-available technology for the destruction of organic material."

4. ThermalKEM
   454 S. Anderson Road
   Rock Hill, SC 29730 (803) 329-9690
   Contact: Nickie Humphries (7/14/89): All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material."

5. Tricil, Ltd.
   1829 Allansport Road
   Thorold, Ont., CANADA (416) 227-7872
   Contact: Gregg Remmelgas (7/14/89): "Material is blended for incineration offsite. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material."

6. CWM/SCA Chemical Services
   11700 S. Stoney Island Avenue
   Chicago, IL 60617 (312) 646-5700
   Contact: Bruce Marti (7/14/89): "The soft-hammer waste that is accepted at this facility is incinerated which is the best-available treatment technology for the destruction of organic material and residues."

Certification

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Joan S Black
Name (Print)

Staff Assistant Chemistry
Title

J Black Jr
Signature

(IF APPLICABLE)
This soft-hammer demonstration/certification replaces previous notice(s) submitted to EPA on the following date(s):

_____ _____

_____ _____

Date: 12-22-89

To: Valdas V. Adamkus
Regional Administrator
USEPA
237 S. Dearborn Street
Chicago, Ill. 60604

MAC 699722

Re: Soft Hammer Demonstration and Certification for

Commonwealth Edison

Name: Quad Cities Station EPA ID No.: ILD 000 803 810

Address: Rt. 84

Cordova, Ill. 61242 Phone No.: 309-654-2241

Dear Sir:

The Land Disposal Restrictions (40 CFR Part 268) prohibit the land disposal of listed hazardous wastes which do not meet treatment standards specified by the US EPA. 40 CFR 268.8(a) requires generators of "soft-hammer" wastes (First- and Second-Third wastes for which no treatment standard has yet been established) to:

(1) Make a good faith effort to locate and contract with treatment and recovery facilities which use the practically-available technology which yields the greatest environmental benefit, and

(2) Submit appropriate documentation of that effort to the EPA Regional Administrator.

This letter is intended to serve as a soft-hammer demonstration and certification for the following waste streams:

EPA Waste Code & Description	EPA Waste Code & Description	EPA Waste Code & Description
U002 Acetone		

All of the soft-hammer waste streams noted above are "U" or "P" code hazardous wastes which, by definition, are commercial chemical products intended to be discarded. These wastes were generated as the result of a laboratory cleanout operation conducted on our behalf by Clean Harbors of Chicago, Inc. None of the wastes included above are spent solvent (F001-F005) or dioxin (F020-F028) wastes.

Clean Harbors of Natick, Inc. has contacted the following hazardous waste treatment and recovery facilities on our behalf and, based on those inquiries, determined that incineration is the best practically-available treatment method for above-described waste streams. In no case will any of the above-listed wastes (or residues) be disposed or treated in a land disposal unit in excess of the California List prohibition levels.

1. Clean Harbors of Braintree, Inc.
   385 Quincy Avenue
   Braintree, MA 02184 (617) 849-1807
   Contact: Doug Lanich (7/14/89): "All material sent to this facility are organic materials (mostly solvents). This material is blended for incineration which is the best available method of treatment for this material."

2. Trade Waste Incineration
   7 Mobile Avenue
   Sauget, IL 62201 (618) 271-2804
   Contact: Dennis Warchol (7/14/89): "Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration"

3. EMSCO, Inc.
   American Oil Road
   El Dorado, AR 71730 (501) 223-4160
   Contact: Eva Dodd (7/14/89): "All material is incinerated on site. Incineration is the best-available technology for the destruction of organic material."

4. ThermalKEM
   454 S. Anderson Road
   Rock Hill, SC 29730 (803) 329-9690
   Contact: Mickie Humphries (7/14/89): All material is incinerated on site in a fixed hearth kiln. All ash is sent to secure chemical landfill. Incineration is the best practical treatment technology for the destruction of organic material."

5. Tricil, Ltd.
   1829 Allansport Road
   Thorold, Ont., CANADA (416) 227-7872
   Contact: Gregg Remmelgas (7/14/89): "Material is blended for incineration offsite. Nonincinerables are neutralized and solidified which significantly reduces the toxicity and hazards of that material."

6. CWM/SCA Chemical Services
   11700 S. Stoney Island Avenue
   Chicago, IL 60617 (312) 646-5700
   Contact: Bruce Marti (7/14/89): "The soft-hammer waste that is accepted at this facility is incinerated which is the best-available treatment technology for the destruction of organic material and residues."

Certification

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Joan Black
Name (Print)

Staff Assistant, Chemistry
Title

Joan Black
Signature

(IF APPLICABLE)
This soft-hammer demonstration/certification replaces previous notice(s) submitted to EPA on the following date(s):

_____ _____

_____ _____

D. Corrective
Action

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: MAY 04 1994

SUBJECT: Justification for Withholding Executive Summary and Conclusions and Recommendations Sections of the Preliminary Assessment/Visual Site Inspection

FROM: Kevin M. Pierard, Chief
Technical Enforcement Section #1
RCRA Enforcement Branch

TO: File

The "Executive Summary" and "Conclusions and Recommendations" sections of the Preliminary Assessment/Visual Site Inspection (PA/VSI) are being withheld as enforcement confidential. This decision is based upon the Freedom of Information Act (FOIA) 5 U.S.C. §552. These sections are excluded based on exemptions 5 U.S.C. §552(b)(5), which state that the PA/VSI is a "predecisional, deliberative document" and 5 U.S.C. §552(b)(7)(A), "disclosure could reasonably interfere with enforcement proceedings".

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

March 31, 1994

Mr. Guy Cambell
Commonwealth Edison Company
22710 206 Avenue North
Cordova, IL 61242

Re: Visual Site Inspection
Commonweath Edison Company
Cordova, Illinois
ILD 060 862 810

Dear Mr. Cambell:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/ Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

COMMONWEALTH EDISON COMPANY
QUAD CITIES NUCLEAR GENERATING STATION
CORDOVA, ILLINOIS
ILD 060 862 810

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 060 862 810
Date Prepared	:	March 30, 1994
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032IL2L
Prepared by	:	PRC Environmental Management, Inc. (Sandy Anagnostopoulos)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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FIGURES

TABLES

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Commonwealth Edison Company -- Quad Cities Nuclear Generating Station (Quad Cities) facility in Cordova, Rock Island County, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified.

The Quad Cities facility is a nuclear power station supplying electricity primarily to northwest Illinois and northeast Iowa. The facility began operations in 1972. The facility is owned by Commonwealth Edison Company and Iowa-Illinois Gas and Electric Company. Day-to-day facility operations are controlled by Commonwealth Edison Company. The Iowa-Illinois Gas and Electric Company provides 25 percent of the operating capital and distributes 25 percent of the electricity generated at the facility to customers in northeast Iowa. The Quad Cities facility generates and manages several hazardous waste streams including: mixed waste (D001, D006, D008, D035, D039, F003, and F005), spent solvents (D001 and D006), waste paint thinner and sludge (D001, D006, D008, D035, D039, F003, and F005), waste Freon (F002), used dry cleaning filters (F002), and used nickel cadmium batteries (D002 and D006). The facility also generates several nonhazardous waste streams including: used oil, waste water-based paint, used antifreeze, wastewater, nonradioactive wastewater treatment sludge, scrap metal, and storm water runoff.

The Quad Cities facility has operated at its current location since 1972. The facility occupies about 780 acres in an agricultural, industrial, and residential area and employs between 800 and 900 people. Employees work three shifts, 365 days a year.

Beginning in November 1990, EPA began regulating mixed low-level radioactive and hazardous wastes. In response to this, the Quad Cities facility submitted a Part A permit application for container storage (S01) at its Mixed Waste Container Storage Area (SWMU 3). Since November 1990, the Quad Cities facility has been regulated as a generator of hazardous waste and interim status storage facility because appropriate disposal facilities for the facility's mixed waste has not been found.

The PA/VSI identified the following 11 SWMUs at the facility:

Solid Waste Management Units

1. Mixed Waste Satellite Accumulation Areas (SAA)
2. Hazardous Waste SAAs
3. Mixed Waste Container Storage Area (CSA)
4. Current Hazardous Waste CSA
5. Former Hazardous Waste CSA
6. Nonhazardous Waste Accumulation Areas
7. Nonhazardous Used Oil Storage Area
8. Nonradioactive Wastewater Treatment Plant
9. Sludge Drying Beds
10. Scrap Metal Accumulation Areas
11. Surface Water Run-off Oil/Water Separators

No AOCs were identified. Because SWMUs 1, 2, 3, and 8 are located indoors on concrete, the potential for release from SWMUs 1, 2, 3, and 8 to groundwater, surface water, air, or on-site soils is low. SWMU 4 is located outdoors on an unbermed concrete pad. Therefore, the potential for release to on-site soils is low to moderate. The potential of release from SWMU 4 to groundwater, surface water, or air is low. Because SWMU 5 was located on concrete and is currently inactive, the potential for release to groundwater, surface water, air, or on-site soils is low. Because SWMU 6, 7, 9, and 10 manage nonhazardous waste in closed containers or on concrete, the potential for release to groundwater, surface water, air, or on-site soils is low. Because SWMU 11 is constructed of concrete and is located underground, the potential of release to groundwater, surface water, air, or on-site soils is low.

The facility occupies about 780 acres in a mixed residential, agricultural, and industrial area of Cordova, Rock Island County, Illinois. Cordova has a population of about 670 people.

The facility is bordered on the east and south by agricultural land, on the west by the Mississippi River, and on the north by agricultural land and an industrial park. The majority of the facility's 780 acres consists of undeveloped land that serves as a buffer zone between the facility and the surrounding community. The active operating area of the facility is located on the west side of the property along the Mississippi River. The facility is surrounded by a chain-link fence topped with barbed wire. The facility is staffed by a security force 24 hours a day. Electronic monitors and closed circuit television are also used to monitor access to protected and vital areas of the facility.

The nearest residence is located within 0.1 mile north of the facility. The nearest surface water body, the Mississippi River, is located adjacent to the facility and is used for industrial and drinking water and recreational and transportation purposes. Groundwater in the area is used for drinking, industrial, and agricultural purposes. The general direction of groundwater flow in the area is to the southwest, towards the Mississippi River. Two on-site wells are used for drinking and process water. These wells are located east and upgradient of the operating plant area. The nearest off-site well is located within 0.1 mile north and upgradient of the facility. The nearest sensitive environment is the Upper Mississippi River Wildlife and Fish Refuge located across the river west of the facility.

PRC recommends that no further action be taken for all of the SWMUs except SWMU 4 at the Quad Cities facility at this time. PRC recommends a berm be constructed around SWMU 4 to contain any spills which may occur in the future.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Commonwealth Edison Company -- Quad Cities Nuclear Generating Station (Quad Cities) facility (EPA Identification No. ILD 060 862 810) in

Cordova, Rock Island County, Illinois. The PA was completed on January 6, 1994. PRC gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), Illinois Institute of Natural Resources (IINR), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), Federal Emergency Management Agency (FEMA), Rock Island County Health Department, U.S. Geological Survey (USGS), Cordova Village Clerk, and from EPA Region 5 RCRA files. The VSI was conducted on January 7, 1994. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 11 SWMUs and no AOCs at the facility.

The VSI is summarized and 14 of 15 inspection photographs taken during the VSI are included in Appendix A. Some of the photographs have been renumbered; thus, their numbers differ from the photograph numbers in the VSI field notes. The field notes are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

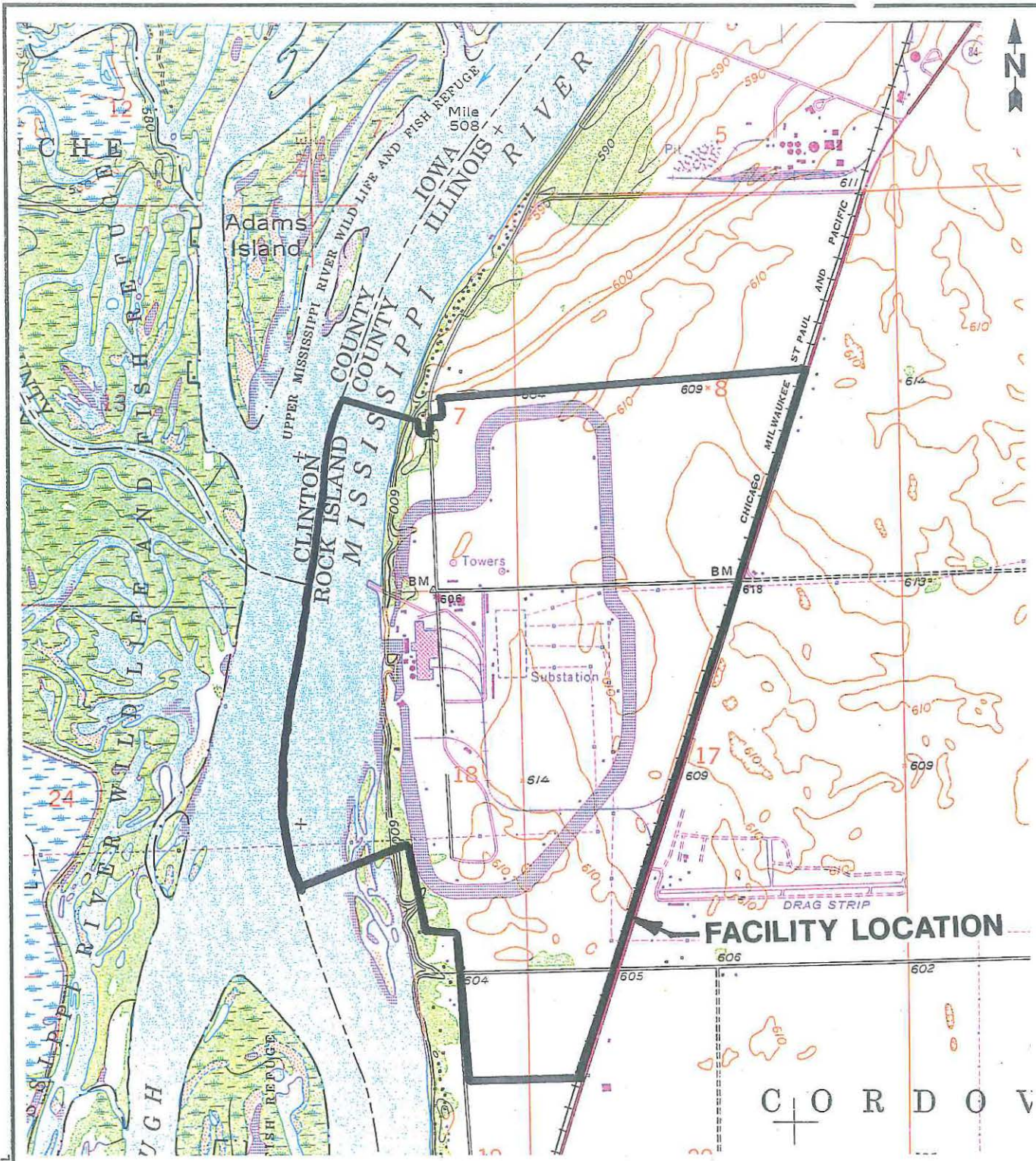
2.1 FACILITY LOCATION

The Quad Cities facility is located at 22710 206th Avenue North in Cordova, Rock Island County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°43'30" N and longitude 90°18'40" W) (CECo 1990). The facility occupies about 780 acres in a mixed residential, agricultural, and industrial area (CECo 1994).

The facility is bordered on the east and south by agricultural land, on the west by the Mississippi River, and on the north by agricultural land and an industrial park (CECo 1994). The majority of the facility's 780 acres consists of undeveloped land that serves as a buffer zone between the facility and the surrounding community. The active operating area of the facility is located on the west side of the property along the Mississippi River.

2.2 FACILITY OPERATIONS

The Quad Cities facility is a nuclear generating station with two boiling water reactors (BWR). The facility supplies electricity primarily to northwest Illinois and northeast Iowa. Heat generated through the fission of nuclear materials is used to boil water that flows through the nuclear reactor core in a closed loop system. The steam resulting from this process is channeled to turbines where the heat energy of the steam is converted to mechanical energy used to drive a generator. The generator then converts the mechanical energy into electrical power. The steam used to drive the turbines is cooled by a condenser which draws water from the Mississippi River. The cooling water does not come into contact with any of the water or steam which contacts the nuclear core. After the cooling water has been heated by use in the condenser, it is cooled by being channeled to the discharge bay and through diffuser pipes to the Mississippi River.



COMMONWEALTH EDISON COMPANY
QUAD-CITIES STATION
CORDOVA, ILLINOIS

FIGURE 1

FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS, CORDOVA, ILLINOIS-IOWA QUADRANGLE 1975

COMM-ED.DWG - 01/20/84 - MLB 309-R05032IL2L

Every 12 to 18 months, the reactors at the facility are refueled because the spent fuel assemblies, which have too many fission products to be efficient, are removed and replaced with new fuel assemblies. During refueling periods, about one-third of the high-level radioactive fuel assemblies are removed and placed into the spent fuel pool located in the fuel handling building. The spent fuel pool is a large pool of water that is about 40 feet deep. Fuel assemblies remain in the pool as the radioactive materials decay and give off heat.

The Quad Cities facility has approximately 240,000 square feet of building space (CECo 1994). It employs between 800 and 900 people. Employees work three shifts, 365 days a year. The facility is surrounded by two chain-link fences topped with barbed wire. The main gate is staffed by a security guard 24 hours a day (CECo 1994). Electronic monitors and closed circuit television are also used to monitor access to protected and vital areas of the facility (CECo 1994).

The Quad Cities facility began operations in 1972. Land use prior to 1972 was agricultural. The facility is owned by Commonwealth Edison Company and Iowa-Illinois Gas and Electric Company. Day-to-day facility operations are controlled by Commonwealth Edison Company. The Iowa-Illinois Gas and Electric Company provides 25 percent of the operating capital and distributes 25 percent of the electricity generated at the facility to customers in northeast Iowa.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes RCRA waste generation and management at the Quad Cities facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2. This report does not discuss the generation of low- and high-level radioactive wastes that are not considered mixed wastes and are, therefore, only regulated by the Nuclear Regulatory Commission (NRC). Additionally, units that manage these radioactive wastes, such as the facility's radioactive waste treatment system and radioactive storage areas, also regulated by the NRC, are not discussed.

The Quad Cities facility produces electricity by using boiling water reactors. General maintenance and operation of the facility result in the generation of several hazardous and nonhazardous waste streams. These waste streams include hazardous spent solvents (D001 and D006), hazardous waste

TABLE 1

SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit[a]	Status
1	Mixed Waste Satellite Accumulation Areas (SAA)	No	Active; accumulation of potentially mixed low-level radioactive and hazardous wastes
2	Hazardous Waste SAAs	No	Active; accumulation of hazardous waste
3	Mixed Waste Container Storage Area (CSA)	Yes	Active; greater than 90-day storage of mixed low-level radioactive and hazardous waste
4	Current Hazardous Waste CSA	No	Active; less than 90-day storage of hazardous waste
5	Former Hazardous Waste CSA	No	Inactive
6	Nonhazardous Waste Accumulation Areas	No	Active; accumulation of nonhazardous used oil and nonhazardous used antifreeze
7	Nonhazardous Used Oil Storage Area	No	Active; storage of nonhazardous used oil
8	Nonradioactive Wastewater Treatment Plant	No	Active; wastewater treatment
9	Sludge Drying Beds	No	Active; wastewater treatment
10	Scrap Metal Accumulation Areas	No	Active; accumulation of scrap metal
11	Surface Water Run-off Oil/Water Separators	No	Active; surface water run-off treatment

Note:

[a] A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code[a,b]	Source	Solid Waste Management Unit
Mixed waste/D001, D006, D008, D035, D039, F003, and F005	General maintenance and cleaning of equipment	1 and 3
Spent solvents/D001 and D006	General maintenance and cleaning of equipment	2, 4, and 5
Waste paint thinner and sludge/D001, D008, D035, D039, F003, and F005	General facility maintenance	2, 4, and 5
Used oil and spent solvent mixtures/D001, D006, D008, D035, D039, F003, and F005	General maintenance of equipment	2, 4, and 5
Waste Freon/F001 and F002	Former on-site laundering operation	3
Used dry cleaning filters/F002	Former on-site laundering operation	3
Used nickel cadmium batteries/D002 and D006	General maintenance of equipment	4
Waste water-based paint/NA	General maintenance of equipment	4 and 6
Used antifreeze/NA	General maintenance of equipment	4 and 6
Used oil/NA	General maintenance of equipment	6 and 7
Wastewater/NC	Wastewater treatment	8
Nonhazardous and nonradioactive wastewater treatment sludge/NA	Wastewater treatment	9
Scrap metal/NA	General facility operations	10
Surface water run-off/NA	Storm water	11

Notes:

[a] Not applicable (NA) designates nonhazardous waste.
[b] Not characterized (NC).

paint thinner and sludge (D001, D008, D035, D039, F003, and F005), hazardous used oil and spent solvent mixtures (D001, D006, D008, D035, D039, F003, and F005), hazardous waste Freon (F001 and F002), used dry cleaning filters (F002), hazardous used nickel cadmium batteries (D002 and D006), nonhazardous used antifreeze, nonhazardous used oils, nonhazardous wastewater, nonhazardous and nonradioactive wastewater treatment sludge, nonhazardous scrap metal, and nonhazardous storm water runoff. Several of these waste streams are accumulated at several hazardous waste satellite accumulation areas (SAA) and nonhazardous waste accumulation areas located throughout the facility. Waste streams generated within the secured operating plant area of the facility have the potential to be radioactively contaminated and are tested for radioactivity. Hazardous waste streams accumulated in the secured operating plant area are accumulated at the Mixed Waste SAAs (SWMU 1). Hazardous waste streams generated outside the secured operating plant area do not have the potential to be radioactively contaminated and are not tested for radioactivity. These hazardous waste streams are accumulated at the Hazardous Waste SAAs (SWMU 2). If a hazardous waste stream from SWMU 1 shows radioactivity, the drum containing the waste is moved to the Mixed Waste CSA (SWMU 3) to be stored until a disposal site can be found for the waste. SWMU 3 is an aluminum building with a maximum storage capacity of 10,230 gallons. Currently, about 6,500 gallons of mixed wastes are stored at this unit. The wastes stored at SWMU 3 include hazardous spent solvents (D001 and D006), hazardous waste paint thinner and sludge (D001, D008, D035, D039, F003, and F005), hazardous used oil and spent solvent mixtures (D001, D006, D008, D035, D039, F003, and F005), hazardous waste Freon (F001 and F002), and hazardous used dry cleaning filters (F002). The hazardous spent solvents, waste paint thinner and sludge, and used oil and spent solvent mixtures are generated through general equipment maintenance and operation. According to facility representatives, the waste Freon and used dry cleaning filters are no longer generated at the facility and were due to an on-site laundering process which was discontinued in the late-1980s and removed in 1993.

If a hazardous waste stream from SWMU 1 does not show radioactivity, the drum containing the waste is moved to the Current Hazardous Waste CSA (SWMU 4). SWMU 4 also manages hazardous waste from SWMU 2. SWMU 4 is located outdoors on a concrete pad measuring about 20- by 20-feet. In addition to waste streams from SWMUs 1 and 2, SWMU 4 manages hazardous used nickel cadmium batteries (D002 and D006), nonhazardous waste water-based paint, and nonhazardous used antifreeze. SET, Incorporated of Wheeling, Illinois removes the batteries for recycling. The

facility generates about one-twelfth of a drum of used nickel cadmium batteries each year. Safety-Kleen Corporation (Safety-Kleen) of Davenport, Iowa, removes the used antifreeze for fuel blending. The facility generates about 200 gallons of used antifreeze each year (PRC 1994a).

SWMU 4 began operation in November 1990. From the early-1980s until the startup date of SWMU 4, nonradioactive hazardous wastes were stored at the Former Hazardous Waste CSA (SWMU 5). SWMU 5 stored waste for less than 90 days and managed similar waste streams as SWMU 4. Wastes were removed from SWMU 5 by various contractors for recycling or fuel-blending depending on the waste stream.

Nonhazardous wastes such as used oil, waste water-based paint, and used antifreeze are accumulated at the Nonhazardous Waste Accumulation Areas (SWMU 6) located throughout the facility. Nonhazardous used oil that accumulated at SWMU 6 is moved to the Nonhazardous Used Oil Storage Area (SWMU 7) to be transported off site for recycling. Since 1992, Safety-Kleen of Davenport, Iowa, has been contracted on a call-in basis to remove the contents of the drums at SWMU 7. Prior to that time, Century Oil (ILD 099 215 303) of Alsip, Illinois, was contracted to remove the used oil for recycling. The Quad Cities facility generates about 4,400 gallons of nonhazardous used oil each year (PRC 1994a). Nonhazardous waste water-based paint and nonhazardous used antifreeze accumulated at SWMU 6 are moved to SWMU 4 to be transported off site for fuel blending. Safety-Kleen has been contracted to remove the waste water-based paint and used antifreeze from SWMU 4. The facility generates about 100 gallons of waste water-based paint and 200 gallons of used antifreeze each year.

The Quad Cities facility generates wastewater from various facility operations that are managed by the Nonradioactive Wastewater Treatment Plant (SWMU 8). Wastewater processed through SWMU 8 include roof run-off, boiler blowdown, and floor drainage from nonradioactive areas of the facility. These wastewaters are not characterized prior to treatment; however, discharge from SWMU 8 is regulated under the facility's National Pollutant Discharge Elimination System (NPDES) permit. Nonhazardous and nonradioactive wastewater treatment sludge generated from SWMU 8 is piped to the Sludge Drying Beds (SWMU 9) for volume reduction via evaporation. After volume reduction, the sludge is emptied from SWMU 9 and placed in 55-gallon drums. The facility has managed and

disposed of approximately 300 cubic feet of this low-level radioactive waste to date. The waste is sent to Barnwell, South Carolina, for disposal.

The Quad Cities facility also generates scrap metal. This scrap metal is collected at the Scrap Metal Accumulation Areas (SWMU 10). SWMU 10 consists of three metal bins located at different locations outside the operating plant area of the facility. Since 1984, Sinow & Wienman Recycling of Dixon, Illinois, has been contracted on a call-in basis to remove the scrap metal for recycling.

Surface water run-off from the facility is treated by the Surface Water Run-off Oil/Water Separators (SWMU 11). SWMU 11 consists of two oil/water separators located underground. Effluent from SWMU 11 is discharged to the Mississippi River. According to facility representatives, SWMU 11 generates very little used oil. The facility has plans to clean the oil/water separators in 1994. The facility has determined that a NPDES permit is not required for this discharge.

2.4 HISTORY OF DOCUMENTED RELEASES

The Quad Cities facility has reported minor spills to IEPA and NRC (CECo 1994). PRC found no documentation that either agency requires any further action regarding these spills from the facility.

2.5 REGULATORY HISTORY

Beginning in November 1990, EPA began regulating mixed low-level radioactive and hazardous wastes. In response to this, on November 26, 1990, the Quad Cities facility submitted a Part A permit application listing container storage of 4,054 pounds of F005 (spent non-halogenated solvent), 14,170 pounds of F002 (spent halogenated solvent), and 19,832 pounds of D001 (ignitable) wastes annually. The facility stated on its Part A permit application that the Quad Cities facility had "controlled" mixed waste since July 6, 1987, although EPA regulation of mixed waste did not become effective until November 1, 1990 (CECo 1990). On March 16, 1993, Commonwealth Edison Company submitted a letter to IEPA regarding revisions to EPA codes listed on the Quad Cities facility Part A permit application. In 1992, the facility repackaged and consolidated mixed waste streams. This resulted in revisions to quantities and additional EPA codes being assigned to the facility's mixed waste as follows: 385 gallons of D001, D008 (lead), D035 (methyl ethyl ketone), or

D039 (tetrachloroethylene) mixed waste; 2,365 gallons of D001 or F005 mixed waste; 1,045 gallons F003 (spent non-halogenated solvents), F005, and D001 mixed waste; 1,265 gallons of D001 mixed waste; and 1,421 gallons of F001 or F002 mixed waste (CECo 1993). Currently, the facility is regulated as a generator of hazardous waste and interim status storage facility because appropriate disposal facilities for the facility's mixed waste has not been found.

The facility has a NPDES permit (Permit No. IL0005037) to discharge to the Mississippi River (IEPA 1993). Although the facility has had minor violations of its NPDES permit, such as exceeding oil and grease limits, PRC found no documentation of outstanding violations or further action required by IEPA with regard to the facility's NPDES permit (CECo 1981).

The facility has an operating permit (No. 73020832) for three natural gas fired heating boilers, three diesel generators, three fuel oil storage tanks, four turbine oil tanks, and two gasoline storage tanks. The facility's operating permit expires on March 4, 1997 (IEPA 1991).

The facility has seven underground storage tanks (UST). Three of the USTs store diesel fuel for use in emergency generators and are regulated by the NRC. These three USTs each have a capacity of 15,000 gallons and are made of steel. The facility has an additional four USTs. Two of these USTs, which store gasoline, have a capacity of 1,000 gallons and are made of fiberglass reinforced plastic. A third UST, which stores diesel fuel, also has a capacity of 1,000 gallons and is made of fiberglass reinforced plastic. A fourth UST, which stores sodium bromide used to treat intake water from the Mississippi River, has a capacity of 5,400 gallons and is made of fiberglass reinforced plastic (CECo 1994).

Evidence of CERCLA activities conducted on site was not found.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

Rock Island County has a continental climate typical of northern Illinois. The lowest average daily temperature is 14 °F in January; the highest average daily temperature is 88 °F in July. Low pressure areas and their associated weather fronts bring frequent changes in temperature, humidity, cloudiness and wind direction during much of the year (USDA 1977).

The total annual precipitation averages 32.8 inches but it has been as low as 20 inches and as high as 50 inches (USDA 1977). The mean annual lake evaporation for the area is about 33 inches (USDC 1979). The 24-hour maximum rainfall is over 6 inches (USDA 1977). Annual snowfall averages about 28 inches. A maximum of 50 inches fell during the winter of 1925-26, with measurable snowfall every month from October to April (USDA 1977).

2.6.2 Floodplain and Surface Water

The majority of the Quad Cities facility is located outside a floodplain with only the bank of the Mississippi River being subject to flooding (FEMA 1982a and FEMA 1982b). All SWMUs identified at the facility were located outside a floodplain. The nearest surface water is the Mississippi River, which borders the facility on the west. The Mississippi River is used for recreational and industrial purposes. Storm water run-off from the roof of the facility is treated by SWMU 8. Surface water run-off from the facility is treated by SWMU 11.

2.6.3 Geology and Soils

The bedrock of Rock Island County consists of sedimentary rock, ranging in age from Cambrian to Pennsylvanian, lying on granitic rock of Precambrian Age. In the area of the Quad Cities facility, bedrock descends to elevations less than 450 feet with unconsolidated deposits exceeding 200 feet in thickness (IINR 1980). Soils in the area are of Sparta-Dickinson-Coyne association. This soil association is on nearly level to strongly sloping terraces. The soil is about 35 percent Sparta soils, 15 percent Dickinson soils, 15 percent Coyne soils, and 35 percent soils of minor extent (USDA 1977).

2.6.4 Groundwater

Groundwater in the area is used as a municipal and private water supply. The general groundwater flow for the area is to the southwest, towards the Mississippi River. The Quad Cities facility has two on-site wells, located east and upgradient of the operating plant area, which are 255 feet and 264 feet deep. Water from these wells is used for drinking and general plant operations. According to representatives of the Rock Island County Health Department, residents, industries, and agriculture within about 5 miles of the facility are served by private or municipal wells ranging between 20 to 200 feet (PRC 1994c).

2.7 RECEPTORS

The facility occupies about 780 acres in an agricultural and industrial area of Cordova, Rock Island County, Illinois. Cordova has a population of about 670 people (PRC 1994b).

The facility is bordered on the east and south by agricultural land, on the west by the Mississippi River, and on the north by agricultural land and an industrial park. The facility is surrounded by two chain-link fences topped with barbed wire. The facility is staffed by a security force 24 hours a day. Electronic monitors and closed circuit television are also used to monitor access to protected and vital areas of the facility (CECo 1994).

The nearest residence is located within 0.1 mile north of the facility. The nearest surface water body, the Mississippi River, is located adjacent to the facility and is used for industrial and drinking water and for recreational and transportation purposes. Groundwater in the area is used for drinking, industrial, and agricultural purposes (PRC 1994c). Two on-site wells are used for drinking and general plant operations. These two wells are located east and upgradient of the operating plant area. The nearest off-site well is located within 0.1 mile north and upgradient of the facility. The nearest sensitive environment is the Upper Mississippi River Wildlife and Fish Refuge located across the river west of the facility (USGS 1975).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the eleven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1 **Mixed Waste SAAs**

Unit Description: This unit consists of four SAAs located within the secured operating plant area of the facility. Each SAA consists of a 3-foot by 3-foot area with a 55-gallon steel drum that manages a single hazardous waste stream. The SAAs of this unit are centralized in two locations within the secured operating plant area of the facility.

Date of Startup: According to facility representatives, the SAAs of this unit began operation at various times after 1989.

Date of Closure: This unit is active.

Wastes Managed: This unit manages potential mixed waste. Wastes collected at this unit have the potential to be radioactive because the wastes are generated within the secured operating plant area of the facility. This unit manages hazardous spent solvents (D001 and D006) and hazardous waste paint thinner and sludge (D001, D008, D035, D039, F003, and F005).

Wastes collected at this unit are tested for radioactivity. If wastes from this unit show radioactivity, the drum containing the waste is moved to the Mixed Waste CSA (SWMU 3) to be stored until a disposal site can be found for the waste. If wastes from this unit do not show radioactivity, the drum containing the waste is moved to the

	Current Hazardous Waste CSA (SWMU 4). From SWMU 4, the waste is transported off site for recycling or fuel blending, depending on the waste stream.
Release Controls:	The areas of this unit are located indoors on a concrete floor. Wastes are accumulated in closed 55-gallon steel drums.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was active at the time of the VSI. A drain leading to the radioactive wastewater treatment system was located about 10 feet from one of the centralized locations of SAAs. PRC noted no evidence of release (see Photographs No. 1 and 2).
SWMU 2	**Hazardous Waste SAAs**
Unit Description:	This unit consists of several SAAs located outside the secured operating plant area of the facility. Each SAA consists of a 3-foot by 3-foot area with a 55-gallon steel drum that manages a single hazardous waste stream. The SAAs of this unit are centralized in three locations outside the secured operating plant area of the facility. One location is indoors near the equipment repair shop. The second location is outdoors on asphalt near the fabrication shop. The third location is indoors on concrete near the oil room.
Date of Startup:	According to facility representatives, the SAAs of this unit began operation at various times after 1989.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages hazardous spent solvents (D001 and D006) and hazardous paint thinner and sludge (D001, D008, D035, D039, F003, and F005). Wastes collected at this unit are not tested for radioactivity because they are generated outside the secured operating area of the plant. When a drum is full, it is moved to the Current Hazardous Waste CSA (SWMU 4) to be transported off site for recycling or fuel blending, depending on the waste stream.
Release Controls:	The areas of this unit are located on concrete. Wastes are accumulated in closed 55-gallon steel drums.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, each drum of the SAAs was closed. The SAAs located outdoors were covered with about 1 inch of snow. Inspection of outdoor SAAs was limited because of snow cover. PRC noted no evidence of release from indoor or outdoor SAAs (see Photographs No. 3, 4, and 5).
SWMU 3	**Mixed Waste CSA**
Unit Description:	This unit stores mixed waste generated at the facility and is located south of the operating plant area of the facility. This unit is a 40-foot by 60-foot aluminum building. Mixed wastes are stored in steel, 55-gallon drums, with a maximum storage capacity of 10,230 gallons. The floor of this unit is epoxy-coated concrete and is sunken into the ground 1 foot below the exterior grade.
Date of Startup:	This unit began operation in November 1990.

Date of Closure:	This unit is active.
Wastes Managed:	This unit manages mixed low-level radioactive and hazardous wastes. Currently, about 6,500 gallons of mixed wastes are stored at this unit. The wastes stored at this unit include hazardous spent solvents (D001 and D006), hazardous paint thinner and sludge (D001, D008, D035, D039, F003, and F005), hazardous oil and solvent mixtures (D001, D006, D008, D035, D039, F003, and F005), hazardous waste Freon (F001 and F002), and dry cleaning filters (F002).
Release Controls:	This unit is located indoors on an epoxy-coated concrete floor which is sunken into the ground 1 foot below the exterior grade. Wastes are stored in steel 55-gallon drums on spill control pallets.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	This unit was active at the time of the VSI. Wastes were stored in labeled drums on spill-control pallets. Aisle space was available between every two rows of drums. PRC noted no evidence of release (see Photographs No. 6 and 7).
SWMU 4	**Current Hazardous Waste CSA**
Unit Description:	This unit is located outdoors, south of the operating plant area of the facility. This unit is on an unbermed concrete pad measuring 20 by 20 feet. Wastes are stored in steel, 55-gallon drums. This unit operates for less than 90-day storage.
Date of Startup:	This unit began operation in November 1990.
Date of Closure:	This unit is active.

Wastes Managed:	This unit manages hazardous spent solvents (D001 and D006), hazardous waste paint thinner and sludge (D001, D008, D035, D039, F003, and F005), hazardous used nickel cadmium batteries (D002 and D006), nonhazardous waste water-based paint, and nonhazardous used antifreeze. SET, Incorporated of Wheeling, Illinois, removes the batteries for recycling. The facility generates about one-twelfth of a drum of used nickel cadmium batteries each year. Safety-Kleen of Davenport, Iowa, removes the waste water-based paint and used antifreeze for fuel blending. The facility generates about 100 gallons of waste water-based paint and 200 gallons of used antifreeze each year (PRC 1994a).
Release Controls:	This unit is located on an unbermed concrete pad. The drums stored at this unit are stored closed and on wooden pallets.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, this unit was covered with about 1 inch of snow. Two 55-gallon steel drums of nonhazardous used antifreeze and one partially-filled, 55-gallon, steel drum of hazardous used nickel cadmium batteries were present. Inspection of this unit was limited due to snow cover, PRC noted no evidence of release (see Photograph No. 8).
SWMU 5	**Former Hazardous Waste CSA**
Unit Description:	This unit was located outdoors, southeast of the operating plant area. This unit was on an unbermed asphalt area measuring 20 by 20 feet. According to facility representatives, wastes were stored in steel, 55-gallon drums. This unit operated for less than 90-day storage.

Date of Startup:	This unit began operation in the early 1980s.
Date of Closure:	This unit was inactive after November 1990.
Wastes Managed:	This unit managed hazardous wastes, including hazardous spent solvents (D001 and D006), hazardous waste paint thinner and sludge (D001, D008, D035, D039, F003, and F005), and nonhazardous used antifreeze.
Release Controls:	This unit was located on an unbermed asphalt area.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, this unit was used as a parking area and was covered with about 1 inch of snow. Inspection of this unit was limited due to snow cover, PRC noted no evidence of release (see Photograph No. 9).
SWMU 6	**Nonhazardous Waste Accumulation Areas**
Unit Description:	This unit consists of nine accumulation areas located throughout the facility. Each accumulation area consists of a 3- by 3-foot area with a 55-gallon, steel drum. Four of these accumulation areas are located indoors near the centralized locations of the Mixed Waste SAAs (SWMU 1). Two other areas are located outdoors near the facility's equipment repair shop. Another area, used by contracted painters, is located outdoors on the southwest side of the facility. Two additional areas are located indoors near the facility's oil room.
Date of Startup:	According to facility representatives, the accumulation areas began operation at various times after 1989.

Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used oil, nonhazardous waste water-based paint, and nonhazardous used antifreeze generated from equipment maintenance. Nonhazardous wastes accumulated in the secured operating plant area are tested for radioactivity. If a nonhazardous waste from this unit shows radioactivity, the drum containing the nonhazardous waste is moved to the facility's radioactive waste storage area and disposed of accordingly. If a nonhazardous waste from this unit does not show radioactivity, the waste is disposed of as follows. Drums containing used oil are moved to the Nonhazardous Used Oil Storage Area (SWMU 7), and drums containing waste water-based paint and used antifreeze are moved to the Current Hazardous Waste CSA (SWMU 4). From SWMU 7, used oil is transported off site for recycling. From SWMU 4, waste water-based paint and used antifreeze are transported off site for fuel blending.
Release Controls:	The accumulation areas are located both indoors and outdoors on concrete. The nonhazardous wastes are managed in closed, 55-gallon, steel drums.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, each drum of the accumulation areas was closed. The accumulation areas located outdoors were covered with about 1 inch of snow. Inspection of outdoor accumulation areas was limited because of snow cover. PRC noted no evidence of release from indoor or outdoor accumulation areas (see Photographs No. 1 and 3).

SWMU 7	**Nonhazardous Used Oil Storage Area**
Unit Description:	This unit is located outdoors, south of the operating plant area of the facility. This unit is on unbermed concrete area measuring about 8 by 15 feet. Used oil is stored in steel, 55-gallon drums.
Date of Startup:	This unit began operation in 1990 (PRC 1994a).
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous used oil generated through equipment maintenance and collected at the accumulation areas of SWMU 6. Since 1992, SET, Incorporated of Wheeling, Illinois, has been contracted on a call-in basis to remove the used oil for recycling. The Quad Cities facility generates about 4,400 gallons of nonhazardous used oil each year (PRC 1994a).
Release Controls:	This unit is located on and unbermed concrete area. The nonhazardous used oil managed at this unit is stored in closed 55-gallon steel drums.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, this unit contained 14 55-gallon steel drums and was covered with about 1 inch of snow. Inspection of this unit was limited due to snow cover, PRC noted no evidence of release (see Photograph No. 10).

SWMU 8	**Nonradioactive Wastewater Treatment Plant**
Unit Description:	This unit is located primarily indoors in a dedicated building, south of the operating plant area. The components of this unit located indoors include the following: one concrete equalization tank with an oil skimmer, two steel combined flocculators and clarifiers with a scum oil tank, two steel sand filters, one concrete effluent storage tank. A 43,000 gallon, concrete oil/water separator is located underground, northwest of the building housing the remaining components of this unit.
Date of Startup:	This unit began operation in the mid-1970s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages wastewaters generated from various facility operations including roof run-off, boiler blowdown, and floor drainage from nonradioactive areas of the facility. This unit processes between 25,000 to 75,000 gallons of wastewater each day. These wastewaters are not characterized prior to treatment; however, discharge from this unit is regulated under the facility's NPDES permit. Used oil collected by the belt skimmer is accumulated in a steel tank and moved to the Nonhazardous Used Oil Storage Area (SWMU 7) to be transported off site for recycling. The belt skimmer generates less than 200 gallons of used oil each year. Nonhazardous and nonradioactive wastewater treatment sludge generated from this unit is piped to SWMU 9 to be dried and then managed as a low-level radioactive waste.
Release Controls:	All but one component of this unit are located indoors on a concrete floor. The remaining component, the oil/water separator, is constructed of concrete and located underground.

History of Documented Releases: The Quad Cities facility has reported minor violations of its NPDES discharge limits from this unit to IEPA and NRC (CECo 1994). PRC found no documentation that either agency requires any further action regarding these spills from the facility.

Observations: At the time of the VSI, this unit was in operation. PRC noted no evidence of release (see Photographs No. 11, 12, and 13). The oil/water separator of this unit was not viewed because it is located underground.

SWMU 9 **Sludge Drying Beds**

Unit Description: This unit is located outdoors, on the southwest side of the facility between SWMUs 3 and 7. This unit consists of 4,800 square feet of concrete beds surrounded by a 3-foot concrete wall.

Date of Startup: This unit began operation in the mid-1970s.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous and nonradioactive wastewater treatment sludge generated by SWMU 8. The sludge is dried at this unit for volume reduction via evaporation. The sludge is emptied from the unit, placed in 55-gallon drums, and taken off site as a low-level radioactive waste for disposal.

Release Controls: This unit is located on concrete and surrounded on three sides by a 3-foot concrete wall.

History of Documented Releases: This unit has no history of documented releases.

Observations:	This unit was in operation at the time of the VSI. Inspection of this unit was limited due to snow cover, PRC noted no evidence of release (see Photograph No. 8).
SWMU 10	**Scrap Metal Accumulation Areas**
Unit Description:	This unit consists of three 5-foot by 5-foot areas used to store metal bins of nonhazardous scrap metal. Each bin has a capacity of 1 cubic yard and is at a different outdoor location at the facility.
Date of Startup:	This unit began operation in the early-1980s (PRC 1994a).
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages nonhazardous scrap metal generated by the facility. Sinow & Wienman Recycling of Dixon, Illinois, has been contracted on a call-in basis to remove the scrap metal for recycling.
Release Controls:	This unit is located on concrete and consists of metal boxes with lids.
History of Documented Releases:	This unit has no history of documented releases.
Observations:	At the time of the VSI, PRC observed only one of the boxes of this unit. The lid of this box was closed (see Photograph No. 14). According to facility representatives, the other two boxes are similar.
SWMU 11	**Surface Water Run-off Oil/Water Separators**
Unit Description:	This unit is located on the west portion of the operating plant area. This unit consists of two 43,000 gallon, concrete oil/water separators. The oil/water separators are located underground.

Date of Startup:	This unit began operation in the mid-1970s.
Date of Closure:	This unit is active.
Wastes Managed:	This unit manages surface water run-off from the facility. This unit processes between 25,000 to 75,000 gallons of wastewater each day. These wastewaters are not characterized prior to treatment. Used oil collected by this unit is moved to the Nonhazardous Used Oil Storage Area (SWMU 7) to be transported off site for recycling. Waste oil from this unit is generated infrequently at this time.
Release Controls:	This unit is constructed of concrete and located underground.
History of Documented Releases:	PRC found no history of release from this unit.
Observations:	At the time of the VSI, this unit was in operation. PRC did not view this unit because it is located underground.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified eleven SWMUs and no AOCs at the Quad Cities facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMUs 1 and 2 **Mixed Waste SAAs and Hazardous Waste SAAs**

Conclusions: The areas of these units accumulate up to 55 gallons of mixed waste and hazardous wastes in closed steel drums located on concrete. No releases from these units have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 3 **Mixed Waste CSA**

Conclusions: This unit manages closed containers of mixed waste inside an aluminum building. The floor of this unit is epoxy-coated concrete and is sunken into the ground 1 foot below the exterior grade. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 4 **Current Hazardous Waste CSA**

Conclusions: This unit manages closed containers of hazardous waste on an unbermed concrete pad and operates for less than 90-day storage. No release from this unit has been documented. Because this unit is outdoors and not bermed, the potential for releases to on-site soils is low to moderate. The potential for release to all other environmental media is low.

Recommendations: PRC recommends a berm be constructed around this unit to contain possible future spills.

SWMU 5 **Former Hazardous Waste CSA**

Conclusions: This unit managed closed containers of hazardous waste outdoors on a concrete pad and operated for less than 90-day storage. PRC observed no evidence of release at the time of the VSI. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 6 **Nonhazardous Waste Accumulation Areas**

Conclusions: This unit manages closed containers of nonhazardous used oil and nonhazardous used antifreeze both indoors and outdoors on concrete. PRC observed no evidence of release at the time of the VSI. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 7 **Nonhazardous Used Oil Storage Area**

Conclusions: This unit manages closed containers of nonhazardous used oil outside on a concrete pad. PRC observed no evidence of release at the time of the VSI. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 8 **Nonradioactive Wastewater Treatment Plant**

Conclusions: All but one of the various components of this unit are located indoors on a concrete floor. The remaining component, the oil/water separator is constructed of concrete and located underground. Effluent from this unit is discharged to the Mississippi River under the facility's NPDES permit. Occasionally, limits imposed by the facility's NPDES permit have been exceeded but these occurrences have been infrequent. In addition, PRC found no documentation of outstanding violations or further action for this unit required by IEPA. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 9 **Sludge Drying Beds**

Conclusions: This unit manages nonhazardous and nonradioactive wastewater treatment sludge from SWMU 8 in concrete beds. Currently, a sufficient volume of sludge has not yet accumulated at this unit for off-site disposal. If it becomes necessary to dispose of the sludge from SWMU 9, the sludge will be drummed and managed as low-level radioactive waste in accordance with NRC regulations. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 10 **Scrap Metal Accumulation Areas**

Conclusions: This unit manages nonhazardous scrap metal outdoors in steel containers on concrete. PRC observed no evidence of release at the time of the VSI. No release from this unit has been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 11 **Surface Water Run-off Oil/Water Separators**

Conclusions: The components of this unit are constructed of concrete floor and located underground. Effluent from this unit is discharged to the Mississippi River. PRC found no evidence of release from this unit. The potential for release to all environmental media is low.

TABLE 3

SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Mixed Waste SAAs	1989 to present	None	None
2. Hazardous Waste SAAs	1989 to present	None	None
3. Mixed Waste CSA	November 1990 to present	None	None
4. Current Hazardous Waste CSA	November 1990 to present	None	Construction of a berm to contain any future spills
5. Former Hazardous Waste CSA	Early-1980s to November 1990	None	None
6. Nonhazardous Waste Accumulation Areas	1989 to present	None	None
7. Nonhazardous Used Oil Storage Area	1990 to present	None	None
8. Nonradioactive Wastewater Treatment Plant	Mid-1970s to present	Facility has reported occasionally exceeding NPDES limits to IEPA and NRC	None
9. Sludge Drying Beds	Mid-1970s to present	None	None
10. Scrap Metal Accumulation Areas	Early-1980s to present	None	None
11. Surface Water Run-off Oil/Water Separators	Mid-1970s to present	None	None

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APPENDIX A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

(Eight Pages)

VISUAL SITE INSPECTION SUMMARY

Commonwealth Edison Company
Quad Cities Nuclear Generating Station (Quad Cities)
22710 206th Avenue North
Cordova, Illinois 61242
ILD 060 862 810

Date:	January 7, 1994
Primary Facility Representative: Representative Telephone No.: Additional Facility Representatives:	Jean Black, Waste Products Chemist, Commonwealth Edison (309) 654-2241 Paul Behrens, Chemistry Supervisor Ray Moore, NPDES Coordinator Grayce Majewski, Environmental Services Julia Wozniak, Environmental Services
Inspection Team:	Sandy Anagnostopoulos, PRC Environmental Management, Inc. (PRC) Cathy Collins, PRC
Photographer:	Cathy Collins, PRC
Weather Conditions:	Sunny, windy, approximately 10 °F
Summary of Activities:	The visual site inspection (VSI) began at 11:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents. The VSI tour began at 1:50 p.m. PRC observed the following solid waste management units (SWMU): Mixed Waste Satellite Accumulation Areas (SAA) (SWMU 1), Hazardous Waste SAAs (SWMU 2), Mixed Waste Container Storage Area (CSA) (SWMU 3), Current Hazardous Waste CSA (SWMU 4), Former Hazardous Waste CSA (SWMU 5), Nonhazardous Used Oil Storage Area (SWMU 7), Nonradioactive Wastewater Treatment Plant (SWMU 8), Sludge Drying Beds (SWMU 9), and Scrap Metal Accumulation Areas (SWMU 10). The Surface Water Run-off Oil/Water Separators (SWMU 11) were not observed because they are located underground. The tour concluded at 3:30 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 3:45 p.m.

Photograph No. 1 Location: SWMUs 1 and 6
Orientation: South Date: January 7, 1994
Description: This photograph shows one of the centralized locations of the Mixed Waste SAAs (SWMU 1) and the Nonhazardous Waste Accumulation Areas (SWMU 6).

Photograph No. 2 Location: SWMU 1
Orientation: North Date: January 7, 1994
Description: This photograph shows one of the centralized locations of the Mixed Waste SAAs.

Photograph No. 3 Location: SWMUs 2 and 6
Orientation: South Date: January 7, 1994
Description: This photograph shows one of the centralized locations of the Hazardous Waste SAAs (SWMU 2) and the Nonhazardous Waste Accumulation Areas (SWMU 6).

Photograph No. 4 Location: SWMUs 2 and 6
Orientation: West Date: January 7, 1994
Description: This photograph shows one of the centralized locations of the Hazardous Waste SAAs (SWMU 2) and the Nonhazardous Waste Accumulation Areas (SWMU 6).

Photograph No. 5 Location: SWMU 2
Orientation: South Date: January 7, 1994
Description: This photograph shows one of the centralized locations of the Hazardous Waste SAAs.

Photograph No. 6 Location: SWMU 3
Orientation: West Date: January 7, 1994
Description: This photograph shows the Mixed Waste Container Storage Area (CSA).

Photograph No. 7 Location: SWMU 3
Orientation: West Date: January 7, 1994
Description: This photograph shows the Mixed Waste CSA.

Photograph No. 8 Location: SWMUs 4 and 9
Orientation: Northeast Date: January 7, 1994
Description: This photograph shows the Current Hazardous Waste CSA (SWMU 4) in the foreground and the Sludge Drying Beds (SWMU 9) in the background.

Photograph No. 9 Location: SWMU 5
Orientation: West Date: January 7, 1994
Description: This photograph shows the Former Hazardous Waste CSA.

Photograph No. 10 Location: SWMU 7
Orientation: West Date: January 7, 1994
Description: This photograph shows the Nonhazardous Used Oil Storage Area.

Photograph No. 11 Location: SWMU 8
Orientation: North Date: January 7, 1994
Description: This photograph shows a clarifier and flocculator of the Nonradioactive Wastewater Treatment Plant.

Photograph No. 12 Location: SWMU 8
Orientation: Northwest Date: January 7, 1994
Description: This photograph shows the sand filter of the Nonradioactive Wastewater Treatment Plant.

Photograph No. 13 Location: SWMU 8
Orientation: North Date: January 7, 1994
Description: This photograph shows the belt skimmer and associated container of the Nonradioactive Wastewater Treatment Plant.

Photograph No. 14 Location: SWMU 10
Orientation: South Date: January 7, 1994
Description: This photograph shows one of the Scrap Metal Accumulation Areas.

APPENDIX B

VISUAL SITE INSPECTION FIELD NOTES

(11 Sheets)

Commonwealth Edison
Cordova Nuclear Power

January 7, 1994

10°F, sunny, windy

1100 PRC on-site
Sandy Anagnostopoulos-PRC
Cathy Collins - PRC

# of employees
800 - 900
3 shifts - 24 hours
365 days.

2 wells 255' + 264'
~~240' + unknown~~
drinking H_2O and
makeup H_2O for

1/7/94 Dlc

Com Ed - Cordova 1/7/94

reactor.

Demineralizes removed in '93

Ecolochem Company brings in portable truck which does demin

Sewage sludge
(early '80s)
For last 10 years at least been shipped off as rad waste.
Prior to removed by vendor.

WWT. sludge goes off as rad waste also.

1/7/94 AA

Com Ed 1/7/94

25-75,000 gal/day inputs
- roof drains
- floor drains from not rad areas
boiler blowdown
crib-house sump

↓

1/2 oil separator

↓

equalization tank
9 hr retention ~~tank~~ lime as concrete

↓ alum (floculant)

2 floculators (mixes) clarifier carbon steel

solids from clarifier to drying beds

average 88,000 gall/day

↓

sand filters

↓

clear H_2O Reservoir

backwashes filters

↓

AA 1/7/94

47 | Com Ed | 1/7/94

to canal

storm H_2O to unit 1+2 oil sep + out

WWT Drying beds - rad waste.

Rad waste Treat Dept. most H_2O ~ 50,000 gal/discharge in 11/93 9 discharges

→ laundering H_2O equipment + floor drains in plant

AA 1/7/94

Comm Ed | 1/7/94 | 48

Dry cleaning in mid '80s for 5 or 6 years. Removed system in '93. filters + freon in piped waste building.

Lean removal tank in WWT ~ 1875 gallons

belt skimmer off to 200-300 gal tank.

AA 1/7/94

Com Ed 1/7/94

waste oil from WWT
to safety-~~Kleen~~
if not contam.

if contam Plymouth
Diversified out of
Canada runs thru
a "magic truck"
for decon and then
to Safety Kleen
of Davenport.

Facility still has a
few mercury switches

ADR 1/7/94

Com Ed 1/7/94

Currently Solvents
System International
to use a non haz
waste
waste, combustible liq, N.O.S.
~~comb. combust. liq.~~
NA1993, PGIII
(Mineral spirits).
switched in '93

Used Safety Kleen
since early 80s for
3 parts washers.

< 90 Day Accum Area
concrete 20' x 20'
since 11/90

ADR 1/7/94

Old < 90 day Storage area. concrete since early '80s

Mixed Waste Area since 11/90. 40'x60' indoors concrete, epoxy sealed.

Satelite Accum Areas

1. ~~Contain~~ All Mixed waste SAA (Trackwog 2) 4 drums/yr
2. Painters SAA solvent drum + H_2O based paint.

All 1/7/94

3. Heater Pull space Mixed waste area
4. Shop SAA
5. Fabrication Shop SAA
6. Oil room SAA

All SAA evolved is ~~last~~ All since '89.

Do isotopic testing of drums if reason to suspected contaminated or from inside plant. Test positive to

All 1/7/94

mixed waste area.
Test neg. < 90 day area.

- Sodium hypochlorite 10-11,000 gal
- + Poly acrylic acid 5-6000 gal
  in ASTs
- biocide mixture
- condenser chemicals

see list provided for ASTs.

Antifreeze at shop
SAA from cribhouse
None from vehicle
AA 1/7/94

maint.

A 10 feeder transformers w/ PCB oil in plant. These are exempt cause in building and power safety equipment.

Currently a LQG

Bounded by beam field + residences

AA 1/7/94

Com Ed 1/7/94

Non rad asbestos.
Upper Rock Island County L.F.

Rad asbestos
Hanford Reservation
in Washington.

Arcam contractor
who does
removal.
Letter hauling
from Clinton, Iowa
does hauling of
non rad.

Rad asbestos
shipped by rad
approved hauler

DA 1/7/94

Com Ed 1/7/94

Previously used
as farmland

US On non-exempt
tanks volume
checks done daily
will install
continual monitoring
EQ

1350 Tour

P1 Heater Pull SAA
4 drums
Concrete floor
drain to rad waste
Treats ~ 10' from
drums.

DA 1/7/94

1 Drum waste solvents
Waste Mineral Spirits
from turbine floor

1 Drum High Pressure
cooling oil which will
be centrifuged & reused

1 Drum waste synthetic E&C Oil

1 Drum waste oil
from equipment maint

OK 1/7/94

Painters SAA (marked)
1 drum H_2O based paint
1 " oil " "
1 " thinner

concrete floor no
drains

Product & equipment
stored in cabinets
adjacent to SAA.

tarp kept down
over drums when
not in use

pails empty.

OK 1/7/94

 Com Ed 1/7/94

P3 Shop SAA
waste oil 1 drum
waste antifreeze "
waste solvent "

metal recycling dumpster,
about 3 on site
~~Sigmo~~ Sinow
+ Weiman Recycling
from Rock Falls
or Sterling

Don't generally
change antifreeze
but generate one
from maintanance
vehicle
DD 1/7/94

Com Ed 1/7/94

P4 Painters SAA (w)
metal case
2 drums
1 drum waste paint solv.
1 " " H_2O based paint.

kept closed w/
metal bar.

P5 Fab shop SAA
1 drum waste solvents
1 " waste oil based
paint on a pallet
on asphalt

DD 1/7/94

P 6,7 Mixed waste area.
1 foot sunken into ground.
Aluminum building
see mixed waste log. (no access for PRC).

P. 8 < 90 day SA

2 drum ethylene glycol mix non-RCRA waste
1 NiCad Battery
on pallets on concrete to SET out of Weeding

AA 1/7/94

P9 Occasionally (1 yr) non haz oil off to Safety Kleen 235 gal steel.

P10 non haz oil accumulation area goes for recycling to SET

P11 1 clarifier & scum tank

P12 1 sand filter

AA 1/7/94

Comm Ck 1/7/94

P 13 belt skimer w/ metal tank. gets lots of water so valve w/ hose used to manually drain H_2O back to equal tank

WWT system since mid 70's

P 14 Former < 90 day SA asphalt ~20' x 20'

1530 TOUR complete

1545 PRC off-site

1/7/94

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 10, 1993

Mr. Henry Jones
Grow Group, Inc.
4000 DuPont Circle
Louisville, KY 40207

Re: Visual Site Inspection
Martin Varnish Co.
900 W. 49th Place
Chicago, IL 60609
ILD 094 294 964

Dear Mr. Jones:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI will be scheduled upon your receipt of this letter. The inspection team will consist of Robert Geiger and another employee of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Larry Eastep, IEPA - Springfield
Richard Finley, IEPA - Maywood

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 9, 1993

Mr. Guy Cambell
Commonwealth Edison
22710 206 Avenue North
Cordova, IL 61242

Re: Visual Site Inspection
Commonwealth Edison Company
Cordova, IL
ILD 060 862 810

Dear Mr. Cambell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

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The VSI has been scheduled for Friday, January 7, 1994 at 8:30 a.m. The inspection team will consist of Sandy Anagnostopoulos and Cathy Collins of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

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Sincerely yours,

Sheri L. Bruck

for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Larry Eastep, IEPA, Springfield
Grace Mediewski, Commonwealth Edison Company, Chicago
Jean Balck, Commonwealth Edison Company, Cordova
John Tripses, IEPA, Peoria

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QUAD CITIES NUCLEAR POWER STATION

PHOTOGRAPH OF

MIXED WASTE STORAGE FACILITY